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

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

August 20, 2015

Exemption No. 12548
Regulatory Docket No. FAA–2015–2211

Mr. Brian J. Kelly
Principal
Single Malt Media, LLC
13101 Blue Willow Place
Clifton, VA 20124

Dear Mr. Kelly:

This letter is to inform you that we have granted your request for exemption. It transmits our decision, explains its basis, and gives you the conditions and limitations of the exemption, including the date it ends.

By letter dated May 21, 2015, you petitioned the Federal Aviation Administration (FAA) on behalf of Single Malt Media, LLC (hereinafter petitioner or operator) for an exemption. The petitioner requested to operate an unmanned aircraft system (UAS) to conduct aerial cinematography in closed set filming in motion picture and television production.

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 are a DJI Spreading Wings S900 and DJI S800 EVO.

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] and closed set motion picture and filming. 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, Single Malt Media, LLC is granted an exemption from 14 CFR §§ 61.23(a) and (c), 61.101(e)(4) and (5), 61.113(a), 61.315(a), 91.7(a), 91.119(c), 91.121, 91.151(a)(1), 91.405(a), 91.407(a)(1), 91.409(a)(1) and (2), and 91.417(a) and (b), to the extent necessary to allow the petitioner to operate a UAS to perform aerial data collection and closed set motion picture and filming. 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, Single Malt Media, LLC is hereafter referred to as the operator.

Failure to comply with any of the conditions and limitations of this grant of exemption will be grounds for the immediate suspension or rescission of this exemption.

1. Operations authorized by this grant of exemption are limited to the DJI Spreading Wings S900 and DJI S800 EVO 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 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

May 21, 2015

United States Department of Transportation
Docket Operations, M-30
1200 New Jersey Avenue, SE
West Building, Ground Floor, Room W12-140
Washington, DC

RE: Exemption Request Pursuant to Section 333 of the FAA Reform Act of 2012.

Dear Sir or Madam,

We are writing regarding the FAA Modernization and Reform Act of 2012, and the procedures contained within 14 C.F.R 11, to request that Single Malt Media, LLC, be exempted from the Federal Aviation Administration's ("FARs") listed below so that Single Malt Media may operate it's lightweight unmanned aircraft systems (UAS) commercially in airspace regulated by the Federal Aviation Administration (FAA).

The conditions identified and proposed by the applicant are drawn from:

Order 8900.1 CHG 0, Volume 3, Chapter 8-issue a Certificate of Waiver for Motion Picture and Television Filming, as well as similar prior Exemptions granted by the Federal Aviation Administration.

Single Malt Media is an established media production company who's principal Brian J. Kelly, has over 30 years experience in the television and motion picture industry. Mr. Kelly has previously held senior staff positions at the network television level (Discovery Communications) as well as several high profile production companies prior to launching Single Malt Media in 2009. Mr. Kelly was one of the earliest advocates for the safe and effective use of UASs in motion picture and television production while on staff at Discovery Communications in 2007. In his 30 years in television and film production, Mr. Kelly has used both fixed wing aircraft and helicopters for filming purposes on over 50 projects spanning 5 continents. Mr. Kelly has filmed from U.S. military aircraft and helicopters as well as numerous civilian aviation platforms.

Motivated by the loss of several industry colleagues in a tragic helicopter crash (killing a Discovery Channel film crew) in February of 2013, Mr. Kelly launched a UAS cinematography division for Single Malt Media. The significant risk associated with aerial filming is an issue that has haunted our industry for many years. The issue is outlined in stark detail in an article on the industry website ***deadline.com*** which chronicles this ongoing dilemma and outlines multiple accidents and tragic deaths of media professionals as a result of aviation accidents occurring during aerial cinematography operations. The article can be found by following the link.

http://deadline.com/2014/04/helicopter-crash-deaths-hollywood-safety-history-709487/

The bottom line -- since 1980, **33** television and film crewmembers have been killed in aviation related accidents while on the job. That is an average of one a year. While these accidents and the associated loss of life were tragic in of themselves -- they also posed a significant risk to the general public.

Recognizing the value of UAS's as a "game changer" (nearly a decade ago), Mr. Kelly has been involved in thousands of hours of testing and evaluation of UASs furthering their viability as safe and effective camera platforms. It is worth noting, (as a credit to both the technology we use and our internally mandated, redundant, operational and safety procedures) Single Malt Media has never experienced a UAS mishap. Single Malt also has UAS PICs holding recreational pilot certificates.

The evolution and current advancements of UAS technology represents a clear and present economic opportunity for companies around the country and a giant leap forward for our industry to reduce the **significant** safety risk (as well as reducing noise and environmental pollution) associated with the use of helicopters and fixed wing aircraft. The convergence of UAS technology along with the miniaturization of cameras (and gyroscopically stabilized camera mounts) is perhaps the greatest development in the television and film industry in the last 50 years -- creating a new trade specialization and an enormous opportunity for jobs and economic growth.

Therefore, Single Malt Media respectfully requests that the FAA grant Single Malt Media an exemption allowing it to operate lightweight UAS for the purpose of aerial cinematography in closed set motion picture and television production, as well as on restricted access locations and on pre-approved private property with all appropriate permissions and waivers and meeting all other FAA stipulations, conditions and limitations.

Contact Information

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The Specific Sections of Title 14 of the Code of Federal Regulations From Which SMM, LLC Requests Exemption Are:

14 CFR 21, 14 CFR 45.23 (b), 14 CFR 61.113 (a) & (b), 14 CFR 61.3 (a) (1) (i) – (*While we have staff members with recreational certificates, we also have staff with over 500 hours of UAS flight experience currently not holding certificates).*

91.7 (a); 91.9 (b) (2); 91.103 (b); 91.105; 91.109; 91.119; 91.121; 91.151 (a); 91.203 (a); 91.203 (a) & (b); 91.407 (a) (1); 91.409 (a) (2); 91.417 (a) & (b)

Single Malt Media's request for relief is first and foremost that without an FAA exemption our new business unit would not be viable. But beyond this immediate remedy we strongly believe that this exemption will allow us to contribute significantly to an emerging field that represents a very real growth opportunity to the film and television industry while enhancing safety to the general public. As a result, granting of this exemption to Single Malt Media is clearly in the public interest by way of obviating the need for aircraft of significantly greater proportions carrying multiple crew as well as highly flammable fuel in our production operations.

112 P.L. 95 §§ 331-334

Single Malt Media is seeking relief from any currently applicable FARs to prevent us from working on closed set film or television production. The Reform Act in Section 332 provides for such integration of civil unmanned aircraft into our national airspace as it is in the public interest to do so. Single Malt Media's lightweight UAS meet the definition of "small unmanned aircraft" as defined in section 331, and therefore the integration of Single Malt Media's UAS's are expressly contemplated by the Reform Act. Single Malt Media would like to operate its lightweight UAS prior to the time period by which the Reform Act requires the FAA to promulgate rules governing such aircraft.

The FAA has granted similar exemptions in material respect by way of Exemption Nos. 11062 to Astraeus Aerial; 11109 to Clayco, Inc.; 11112 to VDOS Global, LLC.; and 11213 to Aeryon Labs, Inc. In these cases the FAA found that the enhanced safety achieved using an unmanned aircraft (AU) is in the public interest.

Each of the following (SMM operational and safety issues) urges in favor of an exemption for Single Malt Media:

Single Malt Media UAS's SOPs and Equipment:

- **Aircraft**: **DJI Spreading Wings**, **S800 EVO** and **S900** carbon fiber frame equipped with the industry leading DJI A2 flight control system. These are among the most stable and reliable airframes commercially available.

- All our airframes are (by design) equipped with a minimum of 6-engines. While provide exceptional stability, this feature also provides critical safety redundancies. As opposed to quad-copters, 6-engine and 8-engine airframes can land safely even in the event of the loss of one engine. This is an area where we have actively lobbied manufactures and distributors to limit the distribution of quad-rotors because of the "total loss" caused by single engine or rotor blade failure.

- All crews consist of 2 persons. A PIC and a Camera Operator/Spotter. The camera operator/spotter is also fully qualified to operate the UAS in the event of an emergency.

- Preflight and post flight inspections are conducted in accordance with a Single Malt Media flight operations manual that PIC's are required to have read and have in their possession during all flight operations.

- Crews use (2) Industry leading Futaba 14 channel radios. Complying with limits for Class B digital device, pursuant to Part 15 of the FCC Rules.

- Airframes are well below the FAA mandated 55 lbs. Fully loaded and (depending on the camera) most flights are in the 16lb (min) - 30lb (max) range.

- All aircraft are quipped with the A2 GPS flight control system with several levels of redundant safety features including a "go home" feature that allows the aircraft to return to the landing zone and land safely in the event of radio communications loss.

- All aircraft have a maximum altitude governor set for 50 feet below the FAA mandated 400 foot ceiling. All aircraft are also quipped with an iOSD providing the PIC real time visual information including battery level, altitude, attitude, air speed, heading and ascent or descent speeds. While commercially available this is a Single Malt Media mandated safety feature on all of our aircraft.

- All aircraft have an air speed governor set for 30-knots. This is a Single Malt Media mandated software based safety feature and cannot be altered by PIC.

- All aircraft have a maximum distance governor set for 500-yard maximum down range distance from aircraft's designated home point. This is a Single Malt Media mandated safety feature and cannot be altered by the PIC.

- All aircraft are battery powered by (2) lithium polymer batteries. Another (redundant) Single Malt Media mandated safety feature. It is worth noting that this is another area where we have lobbied the industry for a "best practices" guideline of dual battery configurations for safety reasons (in the event of battery failure). No combustible fuels are used on any of our aircraft. PIC's are advised to land when battery power reaches 40%, which is reinforced by a LED warning light on the airframe. Single Malt Media aircraft must land at 35% battery power.

- Single Malt Media publishes operational and flight guidelines in flight manual that all PICs must follow and have in their possession during all flight operations.

- Single Malt Media does not conduct flight operations near airports or in designated "restricted" or "no fly" zones. The UASs operating software on all of our aircraft automatically disables the aircraft in these designated areas preventing it from taking off.

- All UAS flight activities are in support of main production operations and are used for acquiring supplemental footage, scenic scenes and b-roll. UAS's will not be flown over general public and only in the vicinity of authorized production personnel.

- Single Malt Media carries all available liability insurance coverage for the use of UAS in aerial cinematography.

- All flights are limited to (VLOS) visual line of sight.

For these reasons listed, Single Malt Media's operation of small UAS will mitigate risk and not "create a hazard to users of the NAS or the public." 112 P.L. 95 § 333 (b). Given the small size and multiple redundant safety features inherent to the technology and those further mandated by Single Malt Media, combined with our operations within "closed sets" and or "controlled access" and "permitted" locations, Single Malt Media's UAS operations fall well within Congress's contemplated safety parameters when it authored the Reform Act and the corresponding directive to integrate UASs into the national airspace.

We also believe that Single Malt Media's safety standards and practices represent a "level above" what even the FAA is seeking in granting exemptions to UAS operators and may even serve to further enhance the FAA's efforts in the evolving process of creating industry regulations as well as "best standards and practices." Single Malt Media's UASs have an industry leading, "0-loss" safety record and do not pose a threat to the general public or national security.

The FAA has the authority to issue an exemption to Single Malt Media, LLC pursuant to: The Federal Aviation Reform Act 85 P.L. 726 (1958)

As a public benefit, Single Malt Media will advance:

- Industry "best standards and practices" for UAS safety and flight operations.
- Reinforce public opinion on the positive impact of UAS technology and as a result furthering the economic viability of the industry.
- Further a rapidly evolving art form.
- Increase the overall quality of lower budget cable television programming that cannot meet the financial and insurance requirements of renting helicopters or fixed wing aircraft for filming.
- Create jobs and contribute to economic growth in an economy (and an East Coast entertainment market) that desperately needs them.
- Positive environmental impact through a reduction in carbon emissions.
- Reduce the dangers of using significantly larger aircraft carrying highly combustible fuels and as a result save lives.

Summary

Single Malt Media and its' employees have accumulated a combined 100 years of television and film production experience. We have filmed on location in some 70 countries and on every inhabited continent on the planet. The ability to capture moving images from an elevated and moving perspective is something motion picture professionals wish they could include in just about every project. But due to limited budgets, and insurance requirements aerial photography is often cost prohibitive. Tragically, the quest to obtain this "birds eye perspective" when affordable has resulted in the loss of 33 of our friends and colleagues over the last 30 years -- as well as creating a very real risk to property and the public as a whole. The use of UAS technology to capture aerial imagery represents the most significant advancement in motion picture technology in the last 50 years. It also represents the most significant safety advancement.

Single Malt Media has been at the forefront of the testing of this technology for almost a decade. And we have designed and implemented safety and "best practices" procedures that put us at the forefront of this emerging field. As a result of our industry leading safety protocols, redundant designs and use of fail-safe technology, Single Malt Media's use of UAS minimizes the risk to both the NAS and to persons and property on the ground.

In summary, Single Malt Media is seeking exemption from the following Regulations:

14 CFR 21, 14 CFR 45.23 (b), 14 CFR 61.113 (a) & (b), 14 CFR 61.3; (a) (1) (i); 91.7 (a); 91.9 (b) (2); 91.103 (b); 91.105; 91.109; 91.119; 91.121; 91.151 (a); 91.203 (a); 91.203 (a) & (b); 91.407 (a) (1); 91.409 (a) (2); 91.417 (a) & (b); 112 P.L. 95 §§ 331-334 to commercially operate our small lightweight UAS in closed set, restricted access and permitted television and motion picture operations.

Single Malt Media respectfully requests that the FAA grant our exemption, as we feel that our exceptional safety record and creative professionalism are aligned with the FAA's mission to provide the safest and most efficient aerospace system in the world and such exemption is in the public interest.

Respectfully,

Brian J. Kelly
Principal
Single Malt Media, LLC