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

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

August 27, 2015

Exemption No. 12637
Regulatory Docket No. FAA–2015-1459

Mr. William Kaunoa Ah Chan
Owner
UAS Maui
746 Hana Highway
Paia, HI 96779

Dear Mr. Ah Chan:

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 May 6, 2015, you petitioned the Federal Aviation Administration (FAA) on behalf of UAS Maui (hereinafter petitioner or operator) for an exemption. The petitioner requested to operate an unmanned aircraft system (UAS) to conduct ground and flight instruction[1], aerial photography, videography, surveying and site mapping.

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.

[1] The petitioner requested authority to conduct UAS training. At this time, the FAA is unable to authorize UAS operations for training until a further assessment is completed. When the FAA completes its review, we will proceed accordingly and no further action will be required by the petitioner. However, the petitioner is permitted to train its own pilot in commands and visual observers in accordance with condition no. 14 and the other conditions and limitations in this exemption.

Airworthiness Certification

The UAS proposed by the petitioner are the DJI Phantom II, Cheerson CX20, and Yuneec Q500.

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[2]. 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.

[2] 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.

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, UAS Maui 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, UAS Maui is hereafter referred to as the operator.

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

1. Operations authorized by this grant of exemption are limited to the DJI Phantom II, Cheerson CX20, and Yuneec Q500 when weighing less than 55 pounds including payload. Proposed operations of any other aircraft will require a new petition or a petition to amend this exemption.

2. Operations for the purpose of closed-set motion picture and television filming are not permitted.

3. The UA may not be operated at a speed exceeding 87 knots (100 miles per hour). The exemption holder may use either groundspeed or calibrated airspeed to determine compliance with the 87 knot speed restriction. In no case will the UA be operated at airspeeds greater than the maximum UA operating airspeed recommended by the aircraft manufacturer.

4. The UA must be operated at an altitude of no more than 400 feet above ground level (AGL). Altitude must be reported in feet AGL.

5. The UA must be operated within visual line of sight (VLOS) of the PIC at all times. This requires the PIC to be able to use human vision unaided by any device other than corrective lenses, as specified on the PIC's FAA-issued airman medical certificate or U.S. driver's license.

6. All operations must utilize a visual observer (VO). The UA must be operated within the visual line of sight (VLOS) of the PIC and VO at all times. The VO may be used to satisfy the VLOS requirement as long as the PIC always maintains VLOS capability. The VO and PIC must be able to communicate verbally at all times; electronic messaging or texting is not permitted during flight operations. The PIC

must be designated before the flight and cannot transfer his or her designation for the duration of the flight. The PIC must ensure that the VO can perform the duties required of the VO.

7. This exemption and all documents needed to operate the UAS and conduct its operations in accordance with the conditions and limitations stated in this grant of exemption, are hereinafter referred to as the operating documents. The operating documents must be accessible during UAS operations and made available to the Administrator upon request. If a discrepancy exists between the conditions and limitations in this exemption and the procedures outlined in the operating documents, the conditions and limitations herein take precedence and must be followed. Otherwise, the operator must follow the procedures as outlined in its operating documents. The operator may update or revise its operating documents. It is the operator's responsibility to track such revisions and present updated and revised documents to the Administrator or any law enforcement official upon request. The operator must also present updated and revised documents if it petitions for extension or amendment to this grant of exemption. If the operator determines that any update or revision would affect the basis upon which the FAA granted this exemption, then the operator must petition for an amendment to its grant of exemption. The FAA's UAS Integration Office (AFS−80) may be contacted if questions arise regarding updates or revisions to the operating documents.

8. Any UAS that has undergone maintenance or alterations that affect the UAS operation or flight characteristics, e.g., replacement of a flight critical component, must undergo a functional test flight prior to conducting further operations under this exemption. Functional test flights may only be conducted by a PIC with a VO and must remain at least 500 feet from other people. The functional test flight must be conducted in such a manner so as to not pose an undue hazard to persons and property.

9. The operator is responsible for maintaining and inspecting the UAS to ensure that it is in a condition for safe operation.

10. Prior to each flight, the PIC must conduct a pre-flight inspection and determine the UAS is in a condition for safe flight. The pre-flight inspection must account for all potential discrepancies, e.g., inoperable components, items, or equipment. If the inspection reveals a condition that affects the safe operation of the UAS, the aircraft is prohibited from operating until the necessary maintenance has been performed and the UAS is found to be in a condition for safe flight.

11. The operator must follow the UAS manufacturer's maintenance, overhaul, replacement, inspection, and life limit requirements for the aircraft and aircraft components.

12. Each UAS operated under this exemption must comply with all manufacturer safety bulletins.

13. Under this grant of exemption, a PIC must hold either an airline transport, commercial, private, recreational, or sport pilot certificate. The PIC must also hold a current FAA airman medical certificate or a valid U.S. driver's license issued by a state, the District of Columbia, Puerto Rico, a territory, a possession, or the Federal government. The PIC must also meet the flight review requirements specified in 14 CFR § 61.56 in an aircraft in which the PIC is rated on his or her pilot certificate.

14. The operator may not permit any PIC to operate unless the PIC demonstrates the ability to safely operate the UAS in a manner consistent with how the UAS will be operated under this exemption, including evasive and emergency maneuvers and maintaining appropriate distances from persons, vessels, vehicles and structures. PIC qualification flight hours and currency must be logged in a manner consistent with 14 CFR § 61.51(b). Flights for the purposes of training the operator's PICs and VOs (training, proficiency, and experience-building) and determining the PIC's ability to safely operate the UAS in a manner consistent with how the UAS will be operated under this exemption are permitted under the terms of this exemption. However, training operations may only be conducted during dedicated training sessions. During training, proficiency, and experience-building flights, all persons not essential for flight operations are considered nonparticipants, and the PIC must operate the UA with appropriate distance from nonparticipants in accordance with 14 CFR § 91.119.

15. UAS operations may not be conducted during night, as defined in 14 CFR § 1.1. All operations must be conducted under visual meteorological conditions (VMC). Flights under special visual flight rules (SVFR) are not authorized.

16. The UA may not operate within 5 nautical miles of an airport reference point (ARP) as denoted in the current FAA Airport/Facility Directory (AFD) or for airports not denoted with an ARP, the center of the airport symbol as denoted on the current FAA-published aeronautical chart, unless a letter of agreement with that airport's management is obtained or otherwise permitted by a COA issued to the exemption holder. The letter of agreement with the airport management must be made available to the Administrator or any law enforcement official upon request.

17. The UA may not be operated less than 500 feet below or less than 2,000 feet horizontally from a cloud or when visibility is less than 3 statute miles from the PIC.

18. If the UAS loses communications or loses its GPS signal, the UA must return to a pre-determined location within the private or controlled-access property.

19. The PIC must abort the flight in the event of unpredicted obstacles or emergencies.

20. The PIC is prohibited from beginning a flight unless (considering wind and forecast weather conditions) there is enough available power for the UA to conduct the intended operation and to operate after that for at least five minutes or with the reserve power recommended by the manufacturer if greater.

21. Air Traffic Organization (ATO) Certificate of Waiver or Authorization (COA). All operations shall be conducted in accordance with an ATO-issued COA. The exemption holder may apply for a new or amended COA if it intends to conduct operations that cannot be conducted under the terms of the attached COA.

22. All aircraft operated in accordance with this exemption must be identified by serial number, registered in accordance with 14 CFR part 47, and have identification (N−Number) markings in accordance with 14 CFR part 45, Subpart C. Markings must be as large as practicable.

23. Documents used by the operator to ensure the safe operation and flight of the UAS and any documents required under 14 CFR §§ 91.9 and 91.203 must be available to the PIC at the Ground Control Station of the UAS any time the aircraft is operating. These documents must be made available to the Administrator or any law enforcement official upon request.

24. The UA must remain clear and give way to all manned aviation operations and activities at all times.

25. The UAS may not be operated by the PIC from any moving device or vehicle.

26. All Flight operations must be conducted at least 500 feet from all nonparticipating persons, vessels, vehicles, and structures unless:
    a. Barriers or structures are present that sufficiently protect nonparticipating persons from the UA and/or debris in the event of an accident. The operator must ensure that nonparticipating persons remain under such protection. If a situation arises where nonparticipating persons leave such protection and are within 500 feet of the UA, flight operations must cease immediately in a manner ensuring the safety of nonparticipating persons; and
    b. The owner/controller of any vessels, vehicles or structures has granted permission for operating closer to those objects and the PIC has made a safety assessment of the risk of operating closer to those objects and determined that it does not present an undue hazard.

    The PIC, VO, operator trainees or essential persons are not considered nonparticipating persons under this exemption.

27. All operations shall be conducted over private or controlled-access property with permission from the property owner/controller or authorized representative.

Permission from property owner/controller or authorized representative will be obtained for each flight to be conducted.

28. Any incident, accident, or flight operation that transgresses the lateral or vertical boundaries of the operational area as defined by the applicable COA must be reported to the FAA's UAS Integration Office (AFS−80) within 24 hours. Accidents must be reported to the National Transportation Safety Board (NTSB) per instructions contained on the NTSB Web site: www.ntsb.gov.

If this exemption permits operations for the purpose of closed-set motion picture and television filming and production, the following additional conditions and limitations apply.

29. The operator must have a motion picture and television operations manual (MPTOM) as documented in this grant of exemption.

30. At least 3 days before aerial filming, the operator of the UAS affected by this exemption must submit a written Plan of Activities to the local Flight Standards District Office (FSDO) with jurisdiction over the area of proposed filming. The 3-day notification may be waived with the concurrence of the FSDO. The plan of activities must include at least the following:
    a. Dates and times for all flights;
    b. Name and phone number of the operator for the UAS aerial filming conducted under this grant of exemption;
    c. Name and phone number of the person responsible for the on-scene operation of the UAS;
    d. Make, model, and serial or N−Number of UAS to be used;
    e. Name and certificate number of UAS PICs involved in the aerial filming;
    f. A statement that the operator has obtained permission from property owners and/or local officials to conduct the filming production event; the list of those who gave permission must be made available to the inspector upon request;
    g. Signature of exemption holder or representative; and
    h. A description of the flight activity, including maps or diagrams of any area, city, town, county, and/or state over which filming will be conducted and the altitudes essential to accomplish the operation.

31. Flight operations may be conducted closer than 500 feet from participating persons consenting to be involved and necessary for the filming production, as specified in the exemption holder's MPTOM.

Unless otherwise specified in this grant of exemption, the UAS, the UAS PIC, and the UAS operations must comply with all applicable parts of 14 CFR including, but not limited to, parts 45, 47, 61, and 91.

This exemption terminates on September 30, 2017, unless sooner superseded or rescinded.

Sincerely,

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

Enclosures

United States Department of Transportation
Docket Management System
1200 New Jersey Ave., SE
West Building Ground Floor Room W12-140
Washington, DC 20590

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

Aloha Sir or Madam:

We are writing pursuant to the FAA Modernization and Reform Act of 2012 (the "Reform Act") and the procedures contained in 14 CFR 11, to request that UAS Maui, an owner and operator of small unmanned aircraft, be exempted from the Federal Aviation Regulations listed below so that UAS Maui may operate its small unmanned aircraft/lightweight unmanned aircraft systems commercially in airspace regulated by the FAA; as long as such operations are conducted within and under the conditions outlined heron or as may be established by the FAA as required by Section 333.

As identified and described herein, Mr. William Kaunoa Ah Chan is the owner of UAS Maui, Mr. Ah Chan has been a lifelong resident of the State of Hawaii and since childhood has been flying with his father over all of the major Hawaiian Islands primarily fish spotting. He has accumulated over 5,000 flight hours in single engine airplanes and has operated model aircraft his entire life. Being a native Hawaiian he recognizes the value of unobtrusive lightweight unmanned aerial systems. He has a thorough understanding of the airspace system and is fully aware of the wind and weather associated with operating UAV's within the State of Hawaii.

UAS Maui's has the experience, skill set and knowledge to safely operate UAV's and would like to provide the following Commercial services: Ground and Flight Instruction, Aerial Photography/Video and aerial survey and site mapping. We are a very compliant company and find it necessary to request a Certificate of Waiver or Authorization to meet the legal requirements of the FAR's.

UAS Maui exemption request would permit its operation of lightweight, unmanned (remotely controlled in line of sight) aerial systems outside of B, C and D airspace at or below 400AGL.

The Extent of Relief UAS Maui Seeks and the Reason it seeks such relief:

UAS Maui submits this application in accordance with the Reform Act, 112 P.L. 95 §§ 331-334, seeking relief from any currently applicable FARs operating to prevent UAS Maui contemplated commercial operations within the national airspace system. The Reform Act in Section 332 provides for such integration of civil unmanned aircraft systems into our national airspace system as it is in the public's interest to do so. UAS Maui's lightweight UAV/UAS meet the definition of "small unmanned aircraft" as defined in Section 331 and therefore the integration of UAS Maui's lightweight UAV/UAS are expressly contemplated by the Reform Act. UAS Maui would like to operate its lightweight UAV/UAS prior to the time period by which the Reform act requires the FAA to promulgate rules governing such craft.

The Reform Act guides the Secretary in determining the types of UASs that may operate safely in our national airspace system. Considerations include:
The weight, size, speed and overall capabilities of the UAS; Whether the UAS will be operated by line of sight.

112 P.L. 95 § 333 (a). Each of these items militates in favor of an exemption for UAS Maui.

UAS Maui utilizes four counter-rotating propellers for extreme balance, control and stability. They each weigh less than 55 pounds, including payload. Each of UAS Maui's small unmanned aircraft are designed to primarily hover in place and operate at less than 50 knots maximum speed. They are capable of vertical and horizontal operations but operate only within the line of sight of the remote control pilot. In addition to the remote control pilot, UAS Maui uses a visual observe/technician, so at a minimum two UAS Maui personnel govern the safe flight of the aircraft at all times.

Utilizing battery power and not combustible fuels, flights generally last between five and twenty minutes. UAS Maui does not operate its aircraft with less than 30% battery power capacity. Safety systems in place include a GPS mode that allows UAS Maui's aircraft to hover in place if communication with the radio control pilot is lost and then slowly descend when the battery life gets to 25%. Further, UAS Maui's aircraft software will not allow operations within 5 miles of airports or within restricted areas.

UAS Maui intends to operate in sparsely populated areas without hazard to persons or property on the surface. In the event non-participating public enters our operational area we will cease operations until all non-participating public is cleared of the area.

Reasons why UAS Maui's exemption will not adversely affect safety or how the exemption will provide a level of safety at least equal to the existing rule. By granting the exemption and permitting UAS Maui to operate we can log more flight time in FAA controlled airspace which will allow us to innovate and implement new and as of yet undiscovered safety protocols. In addition, UAS Maui submits the following representations:

UAS Maui UASs weigh less than 55 pounds
UAS Maui only operates at or below 400 feet
UAS Maui will only operate for 5-25 minutes per flight
UAS Maui lands its UASs when they reach 30% battery life
UAS Maui will only operate while maintaining line of sight to UASs
UAS Maui will operate with a remote control pilot and a spotter/technician
UAS Maui UASs have a GPS flight modes whereby they hover and then slowly land if communication with the remote control pilot is lost or battery life is below 25%
UAS Maui will only operate in secured areas that are strictly controlled, are away from airports and populated areas
UAS Maui conducts extensive briefings prior to flight, during which safety carries primary importance
UAS Maui will log all flights
UAS Maui always obtains all necessary permissions and permits prior to

operation and will abort/suspend operations should a safety breach or potential danger develops

The following are the regulations that UAS Maui are requesting an exemption:

A. 14 CFR 21 and 14 CFR 91 Airworthiness Certificates, Manuals and the like.

14 CFR 21, Subpart H, entitled Airworthiness Certificates, sets forth requirements for procurement of necessary airworthiness certificates in relation to FAR 91.203 (a) (1). The size, weight and enclosed operational area of UAS Maui UASs permits exemption from Part 21 because UAS Maui UASs meet an equivalent level of safety pursuant to Section 333 of the Reform Act. The FAA is authorized to exempt aircraft from the airworthiness certificate requirement under both the Act (49 USC 44701(f)) and Section 333 of the Reform Act. Both pieces of legislation permit the FAA to exempt UASs from the airworthiness certificate requirement in consideration of the weight, size, speed, maneuverability and proximity to areas such as airports and dense populations. UAS Maui UASs meet or exceed each of the elements.

14 CFR 91.7 Prohibits the Operation of an aircraft without an airworthiness certificate. As no such certificate will be applicable in the form contemplated by the FARs, this regulation is inapplicable.

14 CFR 91.9 (b)(2) requires an aircraft flight manual in the aircraft. As there are no pilots or passengers, and given the size on the UASs, this Regulation is inapplicable. An equivalent level of safety will be achieved by maintaining a manual at the home base and having the manual in the pilots possession when operating. The FAA has previously issued exemptions to this regulation in Exemption # 8607, 8737, 8738,9299, 9299A, 9565, 9565B, 10167A, 10602, 10700 and 32827.

14 CFR 91.121 regarding altimeter settings is inapplicable insofar as UAS Maui UASs will utilize electronic global positioning systems and internal gyroscopes to provide spatial coordination.

14 CFR 91.151(a) & (b) Fuel requirements for flight in VFR conditions, not applicable due to the fact that we will not be using fuel and only using battery power down to 30%.

14 CFR 91.203 (a) and (b) provides for the carrying of civil aircraft certifications and registrations. They are inapplicable for the same reasons described above. The equivalent level of safety will be achieved by maintaining such certifications and registrations at UAS Maui home base.

B. 14 CFR 45.23 Marking of the aircraft

Applicable codes of Federal Regulation require aircraft to be marked according to certain specifications. UAS Maui UASs are, by definition, unmanned. They therefore do not have a cabin, cockpit or pilot station on which to mark certain words or phrases.. Further, two-inch lettering is difficult to place on such small aircraft. Regardless, UAS Maui will mark its UASs in the largest possible lettering by placing the word "EXPERIMENTAL" on its fuselage as required by 14 CFR 45.29 (f) so that the pilot, spotter/technician and others working with the UAV will see the markings. The FAA has previously issued exemptions to this regulation through Exemptions # 8738,10167,10167A and 10700.

C. 14 CFR 61.113 Private Pilot Privileges and Limitations, PIC

Pursuant to 14 CFR 61.113 (a) & (b), private pilots are limited to non-commercial operations. UAS Maui can achieve an equivalent level of safety as achieved by current regulations because UAS Maui UASs do not carry any pilots or passengers. Further, while helpful, a pilot license will not ensure remote control piloting skills, though UAS Maui pilot vetting and training programs will. Further, private pilot licensees will operate UAS Maui UASs with the same skill. Further, the risks attendant to the operation of UAS Maui UASs is far less than the risk levels inherent in the commercial activities outlined in 14 CFR 61, et seq. Thus, allowing UAS Maui to operate its UASs with a private as the pilot in control will exceed current safety levels in relation to 14 CFR 61.113 (a) & (b).

D. 14 CFR 91.119 Minimum safe altitudes

14 CFR 91.119 prescribes safe altitudes for the operation of civil aircraft. It allows helicopters to be operated at lower altitudes in certain conditions. UAS Maui UASs will never operate at an altitude greater than 400 AGL. UAS Maui will, however, operate its UASs in sparsely populated areas and never endanger the person or property of another, we will also cease operations if non-participating public enters our operational area, this will enable us to provide a level of safety at least equivalent to those in relation to minimum safe altitudes. Given the size, weight, maneuverability and speed of UAS Maui UASs , an equivalent level of safety will be achieved.

E. 14 CFR 91.405(a); 407(a)(1); 409(a)(1)&(2); 417(a)&(b): Maintenance Inspections

The above-cited regulations require, amongst other things, aircraft owners and operators to "have (the) aircraft inspected as prescribed in subpart E of this part and shall between required inspections, except as provided in paragraph© of this section, have discrepancies repaired as prescribed in part 43 of this chapter."

These regulations only apply to aircraft with an airworthiness certificate. They will not, therefore, apply to UAS Maui should its requested exemption be granted. UAS Maui conducts an extensive maintenance program that involves regular software updates and constant inspection for assessment of any damaged hardware. Therefore, an equivalent level of safety will be achieved.

F. Summary

UAS Maui seeks an exemption from the following Regulations: 14 CFR 21, subpart H, 14 CFR 45.23(b), 14 CFR 61.113 (a) & (b), 14 CFR 91.7(a), 14 CFR 91.9(b)(2), 14 CFR 91.109(a), 14 CFR 91.119, 14 CFR 91.121, 14 CFR 91.151(a)&(b), 14 CFR 91.203(a)&(b), 14 CFR 91.205(b), 14 CFR 91.405(a), 14 CFR 91.407(a)(1), 14 CFR 91.409(a)(1)&(2), 14 CFR 91.417(a)&(b) to commercially operate its fleet of small unmanned vehicles and lightweight unmanned aircraft systems for flight instruction, aerial photography/video, aerial survey and site mapping. We

would like to also conduct our own research and to develop economic platforms for law enforcement, search & rescue, and disaster relief operations.

Granting UAS Maui request for exemption will reduce current risk levels and thereby enhance safety. Currently, the uses outlined above relies primarily on the use of larger aircraft running on combustible fuels. UAS Maui craft do not contain potentially explosive fuels, are smaller, lighter and more maneuverable than conventional manned aircraft. Further, UAS Maui provides a level of safety at least equal to existing rules and in nearly every instance, greater than existing rules. It is far safer to operate a battery powered lightweight UAS than a manned helicopter. The potential loss of life is diminished because UASs carry no people, we only operate in sparsely populated areas and the extreme maneuverability allow our remote control pilots to avoid hazards. UAS Maui have operated and will continue to operate at and above current safety standards.

UAS Maui respectfully requests that the FAA grant its exemption request without delay.

Sincerely,

William Kaunoa AhChan