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

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

August 27, 2015

Exemption No. 12635
Regulatory Docket No. FAA–2015–1240

Mr. Joe B. Doran
Owner
Skycam Media
16635 Cordillera Drive
Round Rock, TX 78681

Dear Mr. Doran:

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 April 17, 2015, you petitioned the Federal Aviation Administration (FAA) on behalf of Skycam Media (hereinafter petitioner or operator) for an exemption. The petitioner requested to operate an unmanned aircraft system (UAS) to conduct aerial photography and closed-set filmmaking.

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 the DT C8S1300mm Octocopter, Sky Hero Spyder 6 1000mm Hex, SkyCam Frame 4 1000mm Quad, DJI Inspire 1 and the DJI Phantom 3 professional.

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] 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, Skycam Media 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, Skycam Media 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 DT C8S1300mm Octocopter, Sky Hero Spyder 6 1000mm Hex, SkyCam Frame 4 1000mm Quad, DJI Inspire 1 and the DJI Phantom 3 professional 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 September 30, 2017, unless sooner superseded or rescinded.

Sincerely,

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

Enclosures

April 17, 2015

U.S. Department of Transportation
Docket Management System
1200 New Jersey Ave., SE
Washington, DC 20590

Re: Petition of Joe B. Doran (Skycam Media) for an Exemption Request Pursuant to Section 333 of the FAA Reform Act and Part 11 of the Federal Aviation Regulations from 14 C.P.R. Part 21, Subpart H; 61.113(a) & (b); 91.119(c); 91.121; 91.151(a); 91.405(a); 91.407(a)(l); 91.409(a)(2); 91.417(a) & (b).

Dear Sir or Madam:

Pursuant to Section 333 of the FAA Modernization and Reform Act of2012 (the "Reform Act") and 14 C.P.R. Part 11, Joe B. Doran (Skycam Media), Skycam Media does hereby apply for an exemption from the Federal Aviation Regulations ("FAR's") identified below, to allow commercial use of small unmanned aerial systems ("sUAS") for the purpose of aerial photography and filmmaking under certain conditions set forth in the Skycam Media confidential Flight Operations Manual and **identical conditions** set forth in the FAA-issued "Exemption No. 11062", and related exemptions issued to operators for closed set filming. Also, pursuant to 14 CPR § 11.87, we request that the FAA not to delay action based on the following:

1. This petition for exemption does not set precedent. Previous identical exemption requests have been approved.

2. The requested relief is identical to exemptions granted previously, specifically, Exemption(s) Nos. 11062 (Astraeus Aerial), 11066 (Aerial MOB), 11065 (Helivideo), and others.

3. A delay in action on this petition would adversely affect pending requests for aerial filming operations and result in lost opportunity and wages for participating crew, and a delay in the public benefit of granting this petition. In addition, a competitive advantage for unapproved commercial sUAS operators exists and continues to grow every day.

4. We are filing this exemption petition immediately following the finalized operations manual with respect to newly acquired sUAS.

Notwithstanding the request not to publish this petition request in the Federal Register, Skycam Media has submitted supporting materials including the confidential "Flight Operations Manual" which are confidential documents pursuant to 14 CPR § 11.35(b) and are not available to the public.

Pursuant to 14 CFR § 11.87:

1. This application is submitted by:
   SkyCam Media
   16635 Cordillera Dr.
   Round Rock, TX 78681

2. 14 C.P.R.- Regulations for which exemption is requested:
   1) 45.23(b)
   2) 61.113(a) and (b)
   3) 91.119(c)
   4) 91.121
   5) 91.151(a)
   6) 91.203(a) and (b)
   7) 91.405(a)
   8) 91.407(a)(1)
   9) 91.409(a)(2)
   10) 91.417(a) and (b)

UASs operated by Sky Shots weigh less than 55 pounds, including all payload. The operate at speeds of less than 50 knots, can hover, and can simultaneously move in multiple directions. Shy Shots will only operate its UASs in line of sight and will operate only within the sterile environment described in the FOPM. Such operations will insure that the UAS will not create a hazard to users of the NAS or public.

Given the small size of our UASs and the restricted area that they will be operated, Sky shot's UAS operations adhere to the Reform Act's safety requirements.

Additionally, due to the size of the UASs and the limited area in which they will operate, approval of this application presents no national safety concerns. Based on the substantial level of safety surrounding the proposed operations, and the significant public benefit (enhanced safety). Reduction in environmental impacts in the outdoor setting these UASs will operate leaving no trace of activity behind, the grant of the requested exemption is in the public interest. Accordingly, Sky Shots respectfully requests that the FAA grant the requested exemption.

3. Aircraft And Equivalent Level Of Safety:

The operating limitations proposed by Sky Shots provide for a higher level of safety because operations further enhance safety of movie and television filming operations using conventional aircraft.

As set forth in the FOPM, the limitations and conditions include:

- The UASs will weigh less than 55 pounds
- Flights will be operated within line of sight of a pilot and observer
- Maximum flight time for each flight will be 30 minutes or at 25% of battery power reserve whichever comes first.

- Flights will be operated at an altitude of no more than 400 feet AGL as indicated by onboard GPS system.
- Minimum crew for each operation will consist of the UAS pilot, the observer and a camera operator.
- A UAS pilot will be Pilot in Command (PIC).
- A UAS pilot will be an FAA licensed airman with at least a private pilot's certificate and third class Medical
- The UAS will only operate within a confined "sterile area" as defined in the FOPM.
- The FOPM requires the establishment of a "Security Perimeter" for the flight operations area.
- A briefing will be conducted for Planned UAS operations prior to each day's flight. All personnel
- Performing duties within the boundaries of the safety perimeter are required to attend.
- The operator will file a FAA Form 7711-1 or its equivalent, as modified in light of the requested exemption, with the appropriate Flight Standards District Office.
- The operator will obtain consent of all persons involved in the filming and ensure that only Consenting persons will be allowed within 100 feet of the flight operation.
- The operator will submit a written Plan of Activities to the FSDO three days before the proposed shoot as required in the FOPM.
- The Pilot and observer must be trained in UAS operations and received current information on the particular UAS to be operated as required by the FOPM.
- The Observer and Pilot will at all times be able to communicate by voice.
- Written and/or oral permission from the relevant property holders will be obtained.
- All required permissions and permits will be obtained from territorial, state, county, or city Jurisdictions, including local law enforcement, fire or other managing governmental agencies.
- If the UAS loses communications or loses its GPS signal, the UAS will and does have the capability to return to a pre-determined location within the Security Perimeter and land safely.
- The UAS will have the capability to abort a flight in case of unpredicted obstacles or emergencies.

Section 45.23(b): Marking of the Aircraft

The regulation requires:

When marks include only the Roman capital letter "N" and the registration number is displayed on limited, restricted or light-sport category aircraft or experimental or provisionally certificated aircraft, the operator must also display on that aircraft near each entrance to the cabin, cockpit, or pilot station, in letters not less than 2 inches nor more than 6 inches high, the words "limited," "restricted," "light-sport," "experimental," or "provisional," as applicable.

Even though the UAS will have no airworthiness certificate, an exemption may be needed as the UAS will have no entrance to the cabin, cockpit or pilot station on

which the word “Experimental” can be placed. Given the size of the sUAV, two-inch lettering will be impossible. The word “Experimental” will be placed on the fuselage in compliance with §45.29 (f).

The equivalent level of safety will be provided by having the sUAV marked on its fuselage as required by §45.29 (f) where the pilot, observer and others working with the sUAV will see the identification of the UAS as “Experimental.” The FAA has issued the following exemptions to this regulation to Exemptions Nos. 10700, 8738, 10167 and 10167A.

Section 61.113(a) and (b): Private Pilot Privileges and Limitations: Pilot in Command.

Skycam Media is seeking relief from this regulation, as the requirement for a Commercial Pilot License with a second class medical would be an unnecessary burden on the operator with regard to obtaining and certifying UA pilots.

The UAS will not carry a pilot or passengers, and the proposed operations can achieve the equivalent level of safety by requiring the pilot to possess a private pilot's license only, with a valid third class medical. This level of knowledge and skill combined with the proposed operating procedures described in the Flight Operations Manual (VLOS only, closed-set requirements, etc.) will more than adequately allow safe operation within the national airspace system, and with regard to persons or property on the ground. The additional knowledge and skill requirements for a Commercial Pilot's license do not add any level of safety with respect to closed-set small UAS operations in the same manner they do with full scale, passenger-carrying aircraft.

An equivalent or greater level of safety is achieved by requiring UA pilots to have a minimum number of hours logged, flight sequences, knowledge and experience testing, etc. as described in the Flight Operations Manual.

Section 91.119(c): Minimum Safe Altitudes.

Section 91.119 establishes safe altitudes for operation of civil aircraft. Section 91.119 (d) allows helicopters to be operated at less than the minimums prescribed, provided the person operating the helicopter complies with any route or altitudes prescribed for helicopters by the FAA. As this exemption is for a sUAS that is a helicopter and the exemption requests authority to operate at altitudes up to 400 Above Ground Level (AGL,) or not more than 200 above an elevated platform from which filming is planned, an exemption may be needed to allow such operations. As set forth herein, except for the limited conditions stated in the General Operating Manual, the UAS will never operate at higher than 400 AGL. It will however be operated in a restricted area with security perimeter, where buildings and people will not be exposed to operations without their pre-obtained notification and consent when required.

The equivalent level of safety will be achieved given the size, weight, and speed of the UAS as well as the location where it is operated. No flight will be taken without the permission of the property owner or local officials. Because of the advance notice to the property owner and participants in the filming activity, all affected individuals will be aware of the planned flight operations as set forth in the GOM. Compared to flight operations with aircraft or rotorcraft weighing far more than the maximum 55lbs. proposed herein and the lack of flammable fuel, any risk associated with these operations is far less than those presently

presented with conventional aircraft operating at or below 500 AGL in the movie industry. In addition, the low-altitude operations of the sUAS will ensure separation between these small-UAS operations and the operations of conventional aircraft that must comply with Section 91.119.

Section 91.121 : Altimeter Settings

Skycam Media is seeking relief from this regulation, as the UA will not have a barometric altimeter.

Section 91.121 requires each person operating an aircraft to maintain cruising altitude by reference to an altimeter that is set "... to an elevation of the departure airport or an appropriate altimeter setting available before departure." As a UAS may not have a barometric altimeter, but instead a GPS altitude data, an exemption is needed. An equivalent level of safety will be achieved by the operator, pursuant to the FOPM and Safety Check list, confirming the altitude of the launch site shown on the GPS altitude indicator before flight.

Section 91.151(a): Fuel Requirements for Flight in VFR Conditions

Skycam Media is seeking relief from the fuel requirements of this FAR as current battery technology allows the UA to fly for approximately 15-30 minutes in normal conditions. As 91.151(a) requires a 30-minute reserve AFTER reaching the point of intended landing, there is no practical flight possible under this regulation.

An equivalent or greater level o f safety exists as the exact battery level remaining is transmitted to the pilot via radio telemetry, and given that the operating area for the UA is in close proximity to the pilot (VLOS), an unsafe condition where the UA is unable to return for landing due to low battery condition is easily avoidable. Additionally, should a defective battery prematurely deplete, the UA is configured to auto land above the point at which the flight controller detects low voltage. And, as part of the Skycam Media Operations Manual, it is a requirement that any flight be terminated if telemetry is lost. Otherwise, a flight limit of 30 minutes or 25% battery remaining is prescribed.

Section 91.203(a) and (b): Carrying Civil Aircraft Certification and Registration

The regulation provides in pertinent part:

a) Except as provided in § 91.715, no person may operate a civil aircraft unless it has within it the following:
b) An appropriate and current airworthiness certificate. . .
c) No person may operate a civil aircraft unless the airworthiness certificate required by paragraph (a) of this section or a special flight authorization issued under §91.715 is displayed at the cabin or cockpit entrance so that it is legible to passengers or crew.

The UAS fully loaded weighs no more than 55 lbs and is operated without an onboard pilot. As such, there is no ability or place to carry certification and registration documents or to display them on the sUAS. Each sUAS operated by Fly

Habana will be registered with the FAA and all documentation carried by the PIC.

An equivalent level of safety will be achieved by keeping these documents at the ground control point where the pilot flying the sUAS will have immediate access to them, to the extent they are applicable to the sUAS. The FAA has issued numerous exemptions to this regulation. A representative sample of other exceptions includes Exemption Nos. 9565, 9665, 9789, 9789A, 9797, 9797A, 9816A, and 10700.

Section 91.405(a), 91.407(a)(1), 91.409(a)(2); 91.417(a) and (b): Maintenance Inspections

Skycam Media is seeking relied from the above stated FAR's as the UA will not have an airworthiness certificate. Therefore there is no requirement to perform an inspection in order to maintain airworthiness as stated in Appendix D to Part 43 for 1OOhr. and annual inspections.

An equivalent or greater level of safety exists as the Skycam Media Flight Operations Manual does prescribe regular maintenance and inspections, compliance with manufacturer's service bulletins, test flights after maintenance, technician training, and so forth, in the spirit of the scope and detail of Appendix D to Part 43. In addition, while mechanical failures are not out of the question, a crash resulting from a catastrophic failure has a very small amount of risk of injury when compared to a failure in a passenger carrying full size aircraft, for which this regulation was intended.

4. Public Interest:

   Skycam Media believes that allowing commercial use of small-unmanned aircraft will enhance the safety of filming operations by reducing the risk associated with low altitude full size aircraft operations. A manned, turbine powered helicopter operating in close proximity to production personnel and actors on the ground has a far greater risk o f injury than a small, lightweight U A carrying no combustible fuel, especially when the UA is operating within the parameters of the Skycam Media Flight Operations Manual. Additionally, the safe integration of sUAS within the national airspace is a growing concerns amongst pilots, the FAA, and general public. This exemption would provide a safe stepping-stone to a more robust set of future sUAS rules.

5. Level of Safety:

   As outlined in each of the FAR's above for which relief is sought (underlined).

6. Summary: Flying Cross Aerial Production seeks exemption from the following rules for the commercial operation of a small unmanned aerial system in order to conduct filming and photography operations below an altitude of 400' AGL and within a limited operating area: 14 C.P.R. Part 21, Subpart H; 61.113(a) & (b); 91.119(c); 91.121; 91.151(a); 91.405(a); 91.407(a)(l); 91.409(a)(2); 91.417(a) & (b). This exemption will enhance the level of safety currently able to be obtained using full sized manned helicopters for the same type of work.

7. Privacy**:**

All flights will occur over private or controlled access property with the property owner's prior consent and knowledge. Filming will be of people who have also consented to being filmed or otherwise have agreed to be in the area where filming will take place.

Satisfaction of the criteria provided in Section 333 of the Reform Act of 2012--size, weight, speed, operating capabilities, proximity to airports and populated areas and operation within visual line of sight and national security – provide more than adequate justification for the grant of the requested exemptions allowing commercial operation of applicant's UAS in the motion picture and television industry pursuant to the Manual appended here to.

8. Additional Information:

The applicant, Joe Doran, is a safety conscious member of AMA (Academy of Model Aeronautics. He has been flying single rotor RC aircrafts for over 10 yeas, and he has professional competed in acrobatics RC helicopter for over eight years. Joe Doran is also very active in the AMA community, including being the President of a sanctioned club, and he has putting together really large RC helicopter events, with safety as the number one factor. The RC helicopters that are flown usually have a rotor span of over six feet in diameter. Joe Doran has been doing areal photography and cinematography for over four years now with small, unmanned aircraft and lightweight UASs capturing high definition featured films.

If you have any questions or need any additional information, please contact the undersigned at 512-368-4102 or at joe@skycammedia.com

Thank you,

Joe B. Doran
Founder / Owner
SkyCam Media