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

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

September 17, 2015

Exemption No. 12891
Regulatory Docket No. FAA−2015−2689

Mr. Ethan Kaminsky
President
Kaminsky Productions
303 North Indian Canyon Drive
Palm Springs, CA 92262

Dear Mr. Kaminsky:

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 June 5, 2015, you petitioned the Federal Aviation Administration (FAA) on behalf of Kaminsky Productions (hereinafter petitioner or operator) for an exemption. The petitioner requested to operate an unmanned aircraft system (UAS) to conduct aerial cinematography and search and rescue operations.

See Appendix A for the petition submitted to the FAA describing the proposed operations and the regulations that the petitioner seeks an exemption.

Airworthiness Certification

The UAS proposed by the petitioner is a DJI Inspire 1.

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]. 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, Kaminsky Productions 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, Kaminsky Productions is hereafter referred to as the operator.

[1] Aerial data collection includes any remote sensing and measuring by an instrument(s) aboard the UA. Examples include imagery (photography, video, infrared, etc.), electronic measurement (precision surveying, RF analysis, etc.), chemical measurement (particulate measurement, etc.), or any other gathering of data by instruments aboard the UA.

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

1. Operations authorized by this grant of exemption are limited to the DJI Inspire 1 when weighing less than 55 pounds including payload. Proposed operations of any other aircraft will require a new petition or a petition to amend this exemption.

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

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

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

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

6. All operations must utilize a visual observer (VO). The UA must be operated within the visual line of sight (VLOS) of the PIC and VO at all times. The VO may be used to satisfy the VLOS requirement as long as the PIC always maintains VLOS capability. The VO and PIC must be able to communicate verbally at all times; electronic messaging or texting is not permitted during flight operations. The PIC must be designated before the flight and cannot transfer his or her designation for the duration of the flight. The PIC must ensure that the VO can perform the duties required of the VO.

7. This exemption and all documents needed to operate the UAS and conduct its operations in accordance with the conditions and limitations stated in this grant of exemption, are hereinafter referred to as the operating documents. The operating documents must be accessible during UAS operations and made available to the Administrator upon request. If a discrepancy exists between the conditions and limitations in this exemption and the procedures outlined in the operating documents, the conditions and limitations herein take precedence and must be followed. Otherwise, the operator must follow the procedures as outlined in its operating documents. The operator may update or revise its operating documents. It is the operator's responsibility to track such revisions and present updated and revised documents to the Administrator or any law enforcement official upon request. The

operator must also present updated and revised documents if it petitions for extension or amendment to this grant of exemption. If the operator determines that any update or revision would affect the basis upon which the FAA granted this exemption, then the operator must petition for an amendment to its grant of exemption. The FAA's UAS Integration Office (AFS−80) may be contacted if questions arise regarding updates or revisions to the operating documents.

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

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

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

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

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

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

14. The operator may not permit any PIC to operate unless the PIC demonstrates the ability to safely operate the UAS in a manner consistent with how the UAS will be operated under this exemption, including evasive and emergency maneuvers and maintaining appropriate distances from persons, vessels, vehicles and structures. PIC qualification flight hours and currency must be logged in a manner consistent with 14 CFR § 61.51(b). Flights for the purposes of training the operator's PICs and VOs

(training, proficiency, and experience-building) and determining the PIC's ability to safely operate the UAS in a manner consistent with how the UAS will be operated under this exemption are permitted under the terms of this exemption. However, training operations may only be conducted during dedicated training sessions. During training, proficiency, and experience-building flights, all persons not essential for flight operations are considered nonparticipants, and the PIC must operate the UA with appropriate distance from nonparticipants in accordance with 14 CFR § 91.119.

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

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

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

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

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

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

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

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

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

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

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

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

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

27. All operations shall be conducted over private or controlled-access property with permission from the property owner/controller or authorized representative. Permission from property owner/controller or authorized representative will be obtained for each flight to be conducted.

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

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

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

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

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

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

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

Sincerely,
/s/

John S. Duncan
Director, Flight Standards Service

Enclosures

KAMINSKY
Productions

June 5, 2015

U.S. Dept. of Transportation
Docket Management Systems
1200 New Jersey Avenue, SE
West Building Ground Floor, Room W12-140
Washington, DC 20590-0001

SUBJECT: Petition for Section 333 Exemption of the FAA Modernization and Reform Act of 2012

I, Ethan Kaminsky, of 303 N. Indian Canyon Drive in Palm Springs, California 92262, hereby petition the FAA for a Section 333 exemption from various sections of 49 USC of Federal Aviation Regulations.

I am president of Kaminsky Productions, and will be the Pilot in Charge of all aerial photography, following approval of this request.

Pursuant to Section 333 of the FAA Modernization and Reform Act of 2012, Public Law 112-95, I request certain exemptions in order to perform aerial cinematography (henceforth meaning still and/or video) as well as limited search and rescue operations for the Agua Caliente Band of Cahuilla Indians using a small UAV.

Sincerely,

Ethan Kaminsky
President
Kaminsky Productions

OVERVIEW:

I, Ethan Kaminsky, of 303 N. Indian Canyon Drive in Palm Springs, California 92262 hereby petition the FAA for an exemption from various sections of 49 USC of Federal Aviation Regulations. I am president of Kaminsky Productions, and will be the Pilot in Charge of all aerial photography, following approval of this request.

I am a licensed private pilot with a current 3rd Class medical certificate. I have logged more than 200 hours in single-engine Cessna aircraft, 172 and 182.

I have a Bachelor of Fine Arts degree in photography from the Art Center College of Design in Pasadena, California and have won numerous awards for my work from the American Advertising Federation.

I also serve on the board of the Children's Discovery Museum of the Desert. I was named one of the 40 most up and coming people under 40 in the Coachella Valley by Palm Springs Life Magazine.

Kaminsky Productions has been in business since January, 1992. We offer still and video photography services, web development and graphic design. In addition, we have been in discussion with the Agua Caliente Band of Cahuilla Indians regarding assistance in search and rescue operations on reservation property.

As a licensed pilot and professional photographer, I am extremely sensitive and aware of the importance of safety and privacy, especially as it relates to UAVs.

I believe safety is the first and overriding priority in regards to operating a UAV. Additionally, I would not operate a UAV in a manner as to invade the privacy of anyone unaware of our flight intentions.

Kaminsky Productions currently is bound by a $2,000,000 liability insurance policy for all operations. Upon receipt of the Section 333 exemption, we will secure an insurance policy specific to UAV operations.

GEOGRAPHIC AREA OF OPERATION:

Our primary area of operation is in the Coachella Valley, an approximate 645 square mile area with a combined total population of less than 450,000 people.

Based on our current UAV and its camera, we find that most operations are conducted between 25 and 250 feet AGL.

This is due to the focal length of the lens as it relates to the subject matter we are trying to capture. We currently set the UAV not to exceed 250 feet AGL.

We have one controlled airport in the vicinity, Palm Springs International Airport (PSP). Our company has a relationship (through our traditional, non-UAV video production) with the airport's director and operations manager and have a direct line of communication with them.

We believe that if granted a Section 333 exemption, we will be offered a communication channel direct with the control tower at PSP to advise in advance, our flight intentions, and request permission when necessary to fly under the current FAA regulations. This is in addition to the filing of the COA and we believe further enhances our desire to fly safely and responsibly.

UAS INFORMATION:

- Our UAV is a DJI Inspire 1 (model T600). It is a lightweight (6.5 lb. gross weight with all on-board equipment), battery operated four-motor rotorcraft in the form of a quadcopter that takes off and lands vertically that includes the following equipment in flight:
- An on-board flight computer with GPS navigation and location ability that receives signals for flight controls from a ground-based transmitter/controller;
- An on-board camera capable of capturing imagery in the form of full color, high definition still photos and video;
- An on-board telemetry system that delivers flight data from the on-board flight computer to the on-board radio transmitter including altitude AGL, horizontal and vertical speed, compass direction of flight and direction back to its launch site;
- A 2.4GHz on-board radio transmitter that transmits live video from the on-board camera plus all the flight data from the telemetry system described above.

GROUND SYSTEM:

- A Pilot in Command (PIC) in operational control of a flight operation from beginning to end and who controls the UAV while in the air;
- A Visual Observer (VO) that provides a second pair of eyes to visually track the UAV while in flight;
- A 2.4GHz radio transmitter/controller operated by the PIC to control the UAV while in flight;

- A radio receiver receiving live video and flight data from the on-board camera and computer projects it all together onto a screen for the PIC to view during flight.

PRE-FLIGHT CHECKLIST:

- If required, notify the appropriate FAA facility of our launch schedule and location.
- Survey the area of operation for hazards- trees, utility poles and other elements that might compromise the flight, then make a judgment as to whether to proceed.
- Check the weather for wind speed, cloud cover and any forecast changes that might adversely affect flight safety and performance.
- Examine the aircraft – looking at connections and searching for cracks and loose parts.
- Determine that the electronic elements are performing correctly (receiving more than 6 GPS signals along with calibration of the magnetic compass).
- Determine that the barometric altimeter reflects approximately 0 feet AGL.
- Following takeoff, I will hover at an altitude of approximately 10 feet to assure that the home return point is established.
- Exercise all controls to confirm their functionality – if one of the controls is not functioning, the mission will be terminated immediately.
- Operate with a Visual Observer (VO) at my side who will double-check for possible flight hazards. The VO will provide a second pair of eyes to assist the PIC in keeping the UAV within Visual Line of Sight (VLOS). VO will also assist in any emergency maneuvers due to unanticipated events that require a quick landing.

SAFETY AND PRIVACY PROTOCOLS:

- Will not fly over dense traffic or crowds.
- Will give right-of-way to any manned aircraft.
- Will stay clear of FAA controlled airspace at airports (generally a five nautical mile radius), as well as restricted and prohibited zones.
- Will fly no higher than 400' and no further than 1000' from the home point, recognizing that the primary responsibility is to safely keep the aircraft within VLOS.
- Will perform a post-flight check of the Inspire 1 to determine its physical and electronic condition.
- Gain express permission to fly above any and all property within flight plan.

- Follow a preflight checklist confirming battery charge, propeller connection, motor function, etc.
- Calibrate compass before each flight.
- Never fly in high wind or threat of precipitation.
- Always set maximum height and radius flight limits in intelligent controller after analyzing site.
- Utilize a separate camera operator so pilot can concentrate on safe copter flight.
- Use audible alarms of low battery warning from the controller to bring copter back and land well before battery drains.

EXEMPTION REQUEST:

I respectfully request exemption from the following regulations with which I cannot fully comply.

14CFR
Part 21 Airworthiness Certification

Subpart H "prescribes the procedural requirements for issuing and changing design approval, production approval, airworthiness certificates and airworthiness approval."

Response: "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,* and any associated noise certification and testing requirements of part *36,* is not necessary."

Part 61 (a)(b) Parts, General Operating and Flight Rules

(a) Prescribes the requirements for issuing pilot licenses and the privileges and limitations associated with various ratings.

(b) Aeronautical experience means pilot time, flight simulator or flight training device for meeting the appropriate training and flight time requirements for an airman certificate.

Response: Organized or commercially available FAA-approved flight training has yet to be achieved by the UAV industry. While I have regularly used a flight simulator on my computer, those skills are generally not transferable to quadcopter operation.

My sources of training are: the Flight Instruction Manual from DJI Inspire 1; online videos from the manufacturer, as well as videos from users; and most importantly, personal training in a secure location, which is an open area not subject to traffic and/or uninvolved individuals.

Those training flights, which have averaged 10-15 minutes each, deal with setup, physical and electronic safety checks; lift-off followed by hovering at approximately 10 feet to confirm that the GPS system is functioning properly and has registered its Home Point; a prescribed flight plan to familiarize and then master the fight controls and camera; returning to the launch point and landing, either on a plastic pad or having my VO secure the Inspire 1 by hand. I then conduct a post-flight inspection for any problems, log the location and flight time and then view the video.

There are no FAA certified instructors or FAA certified study guides available at this time as the technology continues to develop. I respectfully request an exemption from this rule.

§91.103 (b)(2)
(b)(2) This section deals the pilot's preparations for flight, in particular runway lengths, takeoff and landing distance information.

Response: Since a quadcopter, like a helicopter, takes off and lands vertically, an Inspire 1 pilot would not need to know this information since there are no runways involved and the return from flight is the takeoff point. The FAA has determined that "relief is not necessary."

§ **91.105**
Summary: This section deals with flight crew members at stations.

Response: Since there are no passengers, pilots or crew members, I respectfully request relief from this regulation.

§ **91.109**
Summary: This sections deals with flight instruction, simulated instrument flight and certain flight tests.

Response: None of these functions are applicable to a quadcopter flight and, as stated earlier, there are no FAA certified instructors or FAA certified study guides available at this time for quad-copter operation. I respectfully request an exemption from this rule.

§ 91.119 (a) (b) (c)
Summary: This section deals with minimum safe altitude stating that if the power fails anywhere, an aircraft should have an altitude sufficient so that an emergency landing can occur without hazard to persons or property (91.119 a).

It also sets minimum altitudes over congested areas and uncongested areas as well as has a paragraph on helicopters (91.119 b). It also sets minimum distance (500 feet) from any person, vessel, vehicle, or structure (91.119 c).

Response: None of the altitude requirements in this regulation should apply to a UAS since these aircrafts are required to fly below those altitudes. Their weight, speed and GPS-controlled Return to Home feature mitigates against a catastrophic accident.

A manned aircraft is much heavier and larger than an Inspire 1. If an Inspire 1 were to crash, it carries no humans, no explosive fuel and since it flies primarily over a single piece of private property, any damage would likely be minimal and confined to that area.

As to keeping 500' from any person, vessel, vehicle or structure, the purpose of UAV photography is to fly close to the subject structures with the permission of the owner/ representative.

I maintain that my flight experience with the Inspire 1 provides me with sufficient skills to manage safely any approach under 500 feet. In addition, access to the property is strictly controlled (warning sign and the clearing of any person on the property not involved in the flight). I respectfully request an exemption from this rule.

§ **91.121**
Summary: This section details altimeter settings required to maintain the "cruising altitude or flight level of that aircraft." It requires that the "elevation of the departure airport" be set in the altimeter or the "current reported altimeter setting of a station along the route and within 100 miles of the aircraft".

Response: An UAV cannot comply fully with this section's altitude requirements. The Inspire 1 is equipped with a barometric altimeter which automatically calculates the takeoff altitude (0 AGL) when the aircraft is warmed up– the launch point becomes the "elevation of the departure" point. The altitude of the UAV is visible in the control monitor by the PIC before launch and is consistently updated as the flight progresses. I respectfully request an exemption from this rule.

§91.151
Summary: This section deals with fuel requirements for VFR flights stating, among other things, that "no person may begin a flight in an airplane under VFR condition unless...there is enough fuel to fly to the first point of the intended landing and, "...fly after that for at least 40 minutes (day) and 45 minutes (night)".

Response: This regulation deals with 'reserve' fuel. This could include any condition that increases flight time or fuel consumption. Weather would be one factor including wind, turbulence and the necessity to divert around threatening thunderstorms.

Compliance with this regulation is not possible because the 'fuel" onboard the Inspire 1 is not aviation gas but a DC battery with a maximum flight duration of 25 minutes.

Fuel management of an UAV requires constant monitoring of the battery's state-of-charge and bringing it home before it reaches the manufacturer’s recommended 30-percent level. In our training flights, we've found that a flight of 10-15 minutes to be safe, returning the Inspire 1 to its Home Point around the 40-percent level. I respectfully request an exemption from this rule.

§ **91.405**
Summary: This section deals with aircraft maintenance including regular inspection, the keeping of appropriate maintenance records and replacement of inoperable instruments

Response: Maintenance on the Inspire 1 is quite straight forward. If, in landing, a rotor blade or two are damaged, they are quickly replaced. The traditional instrument cluster in an aircraft is replaced by a data stream from the Inspire 1, visible in the control monitor

Replacement of minor parts are performed by the PIC and a major 'overhaul' that can't be easily resolved will go back to the manufacturer for repair. Currently, there are no required inspections by 'authorized' maintenance personnel and there would be no space/room on board to install a placard of inoperability. I respectfully request an exemption from this rule.

§ **91.407**
Summary/Response: This section addresses requirements after maintenance has been performed. Again, approval of the maintenance before flight is essentially in the hands of the PIC.

Whatever maintenance is performed will be entered in the aircraft log, unless a separate maintenance log is required. Paragraph (b) refers to the prohibition of a pilot carrying passengers or crew members, if the flight characteristics have been substantially affected, before a rated pilot performs an operational check of the maintenance.

Again, this is a PIC's responsibility to preflight the Inspire 1 and determine its flyability. And, as mentioned earlier, there is no pilot, crew members or passengers on board the Inspire 1. I respectfully request an exemption from this rule.

§ **91.409**
Inspections: This section deals with the necessity of annual and 100-hour inspections or "progressive inspections" and approval by authorized persons which will lead to the "issuance of an airworthiness certificate."

Response: As stated earlier, there is no FAA approved inspection protocols nor authorized inspection personnel. The PIC handles those issues each time the Inspire 1 is prepared for flight.

The pre-flight check list enumerated earlier will be followed to determine its mechanical and electronic integrity. I respectfully request an exemption from this rule.

§ **91.417**
Maintenance Records: This section requires a maintenance record be kept on repair, replacement and condition of vital parts (rotors, engines & airframe). Certain records must be retained for one year while other records must be kept with the aircraft even when sold to another part.

Response: The details of this section would be impractical with an Inspire 1, but repair issues can be entered into the aircraft log. I respectfully request an exemption from this rule.

The above requests for exemptions follow the guidance published by the FAA.

COMMUNITY BENEFIT:

First and foremost is the level of safety offered by the use of a small UAV in comparison to a manned fixed wing or rotorcraft. Weighing less than seven pounds with camera and battery, the Inspire 1 is incapable of causing the level of damage or injury caused by a full-size, manned aircraft. Additionally, the ecologic and noise impact is negligible as compared to traditional manned aircraft. Lastly, as tourism and real estate are large parts of our community, the use of a small UAV aerial filming platform is a cost-effective and visually impactful means to promote our resort destination, therefore becoming an economic driver in the community.

ATTACHMENTS:

1. Copy of Pilot License
2. Copy of 3rd Class Medical Certificate
3. DJI Inspire 1 User Manual
4. DJI Inspire 1 Safety Guidelines
5. DJI Inspire 1 Battery Safety Guidelines
6. DJI Inspire 1 Maintenance Manual

I **UNITED STATES OF AMERICA** XI

DEPARTMENT OF TRANSPORTATION ▪ FEDERAL AVIATION ADMINISTRATION

IV NAME
ETHAN SEAN KAMINSKY

V ADDRESS 68905 VISTA CHINO
CATHEDRAL CITY CA 92234-4866

VI NATIONALITY USA	SEX	HEIGHT	WEIGHT	HAIR	EYES
IVa D.O.B. 20 JUN 1970	M	74	250	BROWN	BLUE

IX HAS BEEN FOUND TO BE PROPERLY QUALIFIED TO EXERCISE THE PRIVILEGES OF

II PRIVATE PILOT
III CERTIFICATE NUMBER 3370786
X DATE OF ISSUE 22 SEP 2008

XIV

VIII ACTING ADMINISTRATOR

UNITED STATES OF AMERICA
Department of Transportation
Federal Aviation Administration

MEDICAL CERTIFICATE THIRD CLASS

This certifies that ***(Full name and address):***

ETHAN Sean KAMINSKY
PO Box 1661
Palm Springs CA 92263 USA

Date of Birth	Height	Weight	Hair	Eyes	Sex
06/20/1970	74	240	BROWN	BLUE	M

has met the medical standards prescribed in part 67, Federal Aviation Regulations, for this class of Medical Certificate.

Limitations

None

Date of Examination
04/07/2015

Examiner's Designation No.
05345

Examiner

Signature

Typed Name
MORTON L GUBIN , MD

AIRMAN'S SIGNATURE

Applicant ID: 2001582502

Control No.: 200006845083

FAA Form 8500-9 (3-12) Supersedes Previous Edition NSN: 0052-00-670-7002

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