



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

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

September 17, 2015

Exemption No. 12911
Regulatory Docket No. FAA-2015-2139

Mr. Kurt Wimmer
Counsel for NFL Productions LLC dba NFL Films
One CityCenter
850 Tenth Street, NW.
Washington, DC 20001-4956

Dear Mr. Wimmer:

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

By letters dated May 20, 2015, and August 11, 2015, you petitioned the Federal Aviation Administration (FAA) on behalf of NFL Productions LLC dba NFL Films (hereinafter petitioner or operator) for an exemption. The petitioner requested to operate an unmanned aircraft system (UAS) to conduct aerial videography and closed-set motion picture and television filming.

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 DJI Phantom 1, DJI Phantom 2, and 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 collection¹ 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, NFL Productions LLC dba NFL Films 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

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.

aerial data collection and closed set motion picture and filming. This exemption is subject to the conditions and limitations listed below.

Conditions and Limitations

In this grant of exemption, NFL Productions LLC dba NFL Films 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 1, DJI Phantom 2, and 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 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.nts.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

COVINGTON

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May 20, 2015

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To Whom It May Concern:

Pursuant to Section 333 of the FAA Modernization and Reform Act of 2012 and 14 C.F.R., Part 11, NFL Productions LLC d/b/a NFL Films ("NFL Films"), operator of Small Unmanned Aircraft Systems ("sUAS") equipped to conduct aerial videography of professional football game and training facilities, requests a limited exemption from the below-listed regulations to allow commercial operation of its sUASs, provided that the proposed sUAS operations comply with the conditions outlined below or as established by the Federal Aviation Administration ("FAA") under Section 333.

The name and address of the applicant is: NFL Productions LLC, One Sabol Way, Mt. Laurel, N.J. 08054, c/o Barry M. Wolper, Chief Financial Officer, (856) 222-3545, barry.wolper@nfl.com.

NFL Films makes this request under the "summary grant" process that the FAA announced in April 2015.¹ This request is similar in all material respects to a number of recent grants of exemption, including Grant of Exemption No. 11488 to Advanced Aerial Cinematography, LLC (FAA Docket No. 2014-0090).²

Regulations from which the exemption is requested:

14 C.F.R. part 21

14 C.F.R. § 45.23 (b)

14 C.F.R. §§ 61.113 (a) & (b)

¹ See FAA Summary Grants Speed UAS Exemptions, *available at* <https://www.faa.gov/news/updates/?newsId=82485>.

² The use limitations and arguments in this application are nearly identical to those contained in Advanced Aerial Cinematography's November 24, 2014 application and the FAA's May 5, 2015 approval of that application.

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14 C.F.R. § 91.7 (a)

14 C.F.R. § 91.9 (b) (2)

14 C.F.R. § 91.103

14 C.F.R. § 91.109

14 C.F.R. § 91.119

14 C.F.R. § 91.121

14 C.F.R. § 91.151 (a)

14 C.F.R. §§ 91.203 (a) & (b)

14 C.F.R. § 91.405 (a)

14 C.F.R. 407 (a) (1)

14 C.F.R. § 409 (a) (2)

14 C.F.R. §§ 417 (a) & (b)

NFL Films proposes that it receive an exemption to use sUAS to gather footage from closed-set locations in and around NFL stadiums (on non-game days) and NFL practice facilities. NFL Films would use the footage for the production of television programs. NFL Films would obtain the consent of all personnel in the stadiums and practice facilities in the vicinity in which the sUAS may operate.

The proposed sUAS operation will be conducted safely to minimize risk to the national airspace system ("NAS") or to persons and property on the ground. NFL Films proposes that the exemption apply to civil aircraft that operate within the limitations listed below. These limitations were established in the FAA's grant of Advanced Aerial Cinematography's request for an exemption:

1. The sUAS will weigh 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 sUAS may not be operated at a speed exceeding 87 knots (100 miles per hour). NFL Films may use either groundspeed or calibrated airspeed to determine compliance with the 87 knot speed restriction. In no case will the UA

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be operated at airspeeds greater than the maximum UA operating airspeed recommended by the aircraft manufacturer.

4. The UA will be operated at an altitude of no more than 400 feet above ground level (AGL). Altitude will be reported in feet AGL.
5. The UA will be operated within visual line of sight (VLOS) of the Pilot in Charge (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 will utilize a visual observer (VO). The UA will be operated within the 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 the VLOS capability. The VO and PIC will be able to communicate verbally at all times; electronic messaging or texting will not be permitted during flight operations. The PIC will be designated before the flight and cannot transfer his or her designation for the duration of the flight. The PIC will ensure that the VO can perform the duties required of the VO.
7. This exemption and all documents needed to operate the sUAS and conduct its operations in accordance with the conditions and limitations stated in the grant of exemption, are hereinafter referred to as the operating documents. The operating documents will be accessible during sUAS operations and made available to the Administrator upon request. If a discrepancy exists between the conditions and limitations in the exemption and the procedures outlined in the operating documents, the conditions and limitations herein take precedence and will be followed. Otherwise, NFL Films will follow the procedures as outlined in its operating documents. NFL Films may update or revise its operating documents. It is NFL Films' responsibility to track such revisions and present updated and revised documents to the Administrator or any law enforcement official upon request. NFL Films will also present updated and revised documents if it petitions for extension or amendment to this grant of exemption. If NFL Films determines that any update or revision would affect the basis upon which the FAA granted this exemption, then NFL Films 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.

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9. NFL Films 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 will conduct a pre-flight inspection and determine the sUAS is in a condition for safe flight. The pre-flight inspection will 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 sUAS, the aircraft will be prohibited from operating until the necessary maintenance has been performed and the sUAS is found to be in a condition for safe flight.
11. NFL Films will follow the sUAS manufacturer's maintenance, overhaul, replacement, inspection, and life limit requirements for the aircraft and aircraft components.
12. Each sUAS operated under this exemption will comply with all manufacturer safety bulletins.
13. Under this grant of exemption, a PIC will hold either an airline transport, commercial, private, recreational, or sport pilot certificate. The PIC will 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 also will 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. NFL Films will not permit any PIC to operate unless the PIC demonstrates the ability to safely operate the sUAS in a manner consistent with how the sUAS 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 will 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 sUAS in a manner consistent with how the sUAS 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 will operate the UA with appropriate distance from nonparticipants in accordance with 14 CFR § 91.119.
15. UAS operations will not be conducted during night, as defined in 14 C.F.R. § 1.1. All operations will be conducted under visual meteorological conditions (VMC). NFL Films will not operate flights under special visual flight rules (SVFR).
16. The UA will not operate within 5 nautical miles of an airport reference point (ARP) as denoted in the current FAA Airport/Facility Director (AFD) or for airports not denoted with an ARP, the center of the airport symbol as denoted on

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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 will be made available to the Administrator or any law enforcement official upon request.

17. The UA will 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 sUAS loses communications or loses its GPS signal, the UA will return to a pre-determined location within the private or controlled-access property.
19. The PIC will abort the flight in the event of unpredicted obstacles or emergencies.
20. The PIC will be 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 will 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 will 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 will be as large as practicable.
23. Documents used by NFL Films to ensure the safe operation and flight of the sUAS and any documents required under 14 CFR §§ 91.9 and 91.203 will be available to the PIC at the Ground Control Station of the sUAS any time the aircraft is operating. These documents will be made available to the Administrator or any law enforcement official upon request.
24. The UA will remain clear and give way to all manned aviation operations and activities at all times.
25. The sUAS will not be operated by the PIC from any moving device or vehicle.
26. All Flight operations will 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. NFL Films will ensure that nonparticipating persons remain

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under such protection. If a situation arises where nonparticipating persons leave such protection and are within 500 feet of the UA, flight operations will 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, essential persons, or individuals who have signed consent forms are not considered nonparticipating persons under this exemption.

- 27. All operations will 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 will be reported to the FAA's UAS Integration Office (AFS-80) within 24 hours. Accidents will be reported to the National Transportation Safety Board (NTSB) per instructions contained on the NTSB Web site: www.nts.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. NFL Films will have a motion picture and television operations manual (MPTOM) as documented in this grant of exemption.
- 30. At least 3 days before aerial filming, NFL Films will 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 sUAS aerial filming conducted under this grant of exemption;
 - c. Name and phone number of the person responsible for the on-scene operation of the sUAS;
 - d. Make, model, and serial or N-Number of the sUAS to be used;

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- e. Name and certificate number of sUAS 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 will 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, the sUAS operations will comply with all applicable parts of 14 CFR including, but not limited to, parts 45, 47, 61, and 91. NFL Films incorporates all arguments in support of the petition made in Advanced Aerial Cinematography's November 24, 2014 application for exemption.

Federal Register Notice

As stated above, publication in the Federal Register is unnecessary because this application meets the FAA's criteria for summary approval. To the extent that the FAA determines that publication is necessary, the following summary is provided:

Applicant seeks an exemption from the following rules: 14 C.F.R. § 21, subpart H; 14 C.F.R. 45.23 (b); 14 C.F.R. § 61.113 (a) & (b); 91.7 (a); 91.9 (b)(2); 91.103 (b); 91.109; 91.119; 91.121; 91.151(a); 91.203 (a) and (b); 91.405 (a); 91.407 (a)(1); 91.409 (a)(2); 91.409 (a)(2) and 91.417 (a) & (b) to operate commercially a small unmanned vehicle (55 lbs or less) in videography operations.

The Exemption is in the Public Interest

As demonstrated above, the proposed sUAS operations would minimize the risk of harm to individual safety or damage to the NAS and property. The operations proposed by NFL Films would provide tremendous public benefits by enabling millions of NFL fans to view footage that could not be captured via any other technology. The sUAS operations as described in this application will be far safer and more efficient than use of helicopters or other aircraft to capture the required footage.

The conditions outlined in this petition clearly satisfy Section 333's exemption criteria regarding "size, weight, speed, operational capability, proximity to airports and populated areas, and operation within visual line of sight," and therefore the proposed operations would not

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“create a hazard to users of the national airspace system or the public or pose a threat to national security.” As discussed above, NFL Films agrees to use limitations that are substantially identical to those contained in the FAA’s recent grant of exemption for Advanced Aerial Cinematography. Accordingly, the proposed UAS operations of NFL Films should not raise safety or national security concerns, and should receive summary approval.

Please do not hesitate to contact the undersigned if you need additional information.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Kurt Wimmer", with a long horizontal flourish extending to the right.

Kurt Wimmer
Jeff Kosseff

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Filed Electronically Via Regulations.gov

August 11, 2015

Dan Ngo
FAA Office of Rulemaking
800 Independence Ave. SW
Washington, DC 20591

Re: FAA-2015-2139

Dear Mr. Ngo:

Attached please find a Motion Picture and Television Operations Manual ("MPTOM") prepared by NFL Films for the above-referenced docket. The MPTOM includes, at Appendix B, a description of the aircraft makes, models, and types, as requested, for the proposed UAS operation.

This letter and the attachment were filed online at regulations.gov in Docket No. FAA-2015-2139.

Please contact me if you have any questions.

Sincerely,

/s/ Stephen Kiehl

Stephen Kiehl

Attachment

Motion Picture and Television Flight Operation Manual

NFL Productions LLC d/b/a NFL Films
One Sabol Way
Mt. Laurel, NJ 08054
(856) 222-3545 | (856) 291-5455 (Fax)

Date: August 11, 2015

Version: Original

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Appendix A

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Revision Control Page

Revision #

Date

Initials

[illegible]

Motion Picture and Television Flight Operation Manual

A. Purpose

This Manual has been developed by NFL Productions LLC d/b/a NFL Films (“NFL Films”) in conjunction with an application for an exemption from a limited number of regulations pursuant to Section 333 of the FAA Modernization and Reform Act of 2012 and 14 C.F.R. Part 11, as outlined in NFL Films’ exemption application dated May 20, 2015, for use of sUAS to gather footage from closed-set locations in and around NFL stadiums (on non-game days) and NFL practice facilities. NFL Films’ pilots and other company personnel when applicable will comply with the policies, procedures, and conditions of this Manual, whenever motion picture or television flight operations are performed that require an exemption.

B. Pilot/Operator Organization

NFL Productions LLC d/b/a NFL Films -- Operator

One Sabol Way

Mt. Laurel, NJ 08054

Barry M. Wolper - Chief Financial Officer and applicant/responsible person - (856) 222-3545

C. Pilots To Be Used During Filming

Pilots to be used during filming will be included in the Plan of Activities to be filed at least three (3) days prior to each scheduled filming, pursuant to Section H, *infra*, with the local FSDO having jurisdiction over the area of proposed filming. The list of pilots will include each pilot’s pilot certificate number as well as special pilot authorizations or endorsements, if applicable.

D. List of Aircraft by Make, Model and Serial or Registration Number

A list of aircraft to be used appears in Appendix B, *infra*. Furthermore, any aircraft to be used in the proposed filming shall be listed by make, model and serial or registration number in the Plan of Activities to be filed at least three days prior to each scheduled filming, pursuant to Section H, *infra*, with the local FSDO having jurisdiction over the area of proposed filming.

E. Distribution and Revision

NFL Films will issue a copy of this manual, including all revisions, to all personnel involved in sUAS operation. All recipients are required to keep their manuals up-to-date with any furnished revisions.

Amendments in FARs and normal usage will frequently indicate a need for additions, deletions, or corrections of selected subject matter in this manual. Revisions to the manual will be issued periodically to reflect these changes. In addition, manual users who observe or experience a need for change are encouraged to submit their suggestions to the Chief Financial Officer for review and consideration.

Revisions to the Manual will be forwarded to the Flight Standards District Office (FSDO) at least 15 days before the proposed effective date. Revisions will be noted on the Revision

Control Page at the front of this Manual and will be noted in bold in this Manual. Each subsequent revision of the Manual will be distributed to all company personnel involved in sUAS operation.

F. Persons Authorized

Section 91.119(c) is waived only with respect to those participating persons, vehicles, and structures directly involved in the performance of the actual filming. The pilot-in-command and certificate holder shall ensure that no persons are allowed within 500 feet of the area except those consenting to be involved and necessary for the filming production. This provision may be reduced to no less than 200 feet in the event that a suitable, equivalent level of safety can be achieved. An equivalent level of safety may be determined by evaluation of the filming production area and the degree of terrain features, buildings, etc. that will provide a safety barrier to observers.

Prior to any filming, the pilot-in-command and certificate holder shall be responsible for obtaining signed consent forms from any person who is allowed within 500 feet (or 200 feet as outlined above) of the filming. Such consent forms shall be maintained by the operator for a period of at least six (6) months following the filming.

G. Area of Operations

The area of operations shall cover all NFL stadiums and practice facilities in the United States, including:

NFL Stadiums

Arizona Cardinals
University of Phoenix Stadium
Glendale, AZ 85305

Miami Dolphins
Sun Life Stadium
Miami Gardens, FL 33056

Atlanta Falcons
Georgia Dome
Atlanta, GA 30313

Minnesota Vikings
TCF Bank Stadium
Minneapolis, MN 55455

Baltimore Ravens
M&T Bank Stadium
Baltimore, MD 21230

New England Patriots
Gillette Stadium
Foxboro, MA 02035

Buffalo Bills
Ralph Wilson Stadium
Orchard Park, NY 14127

New Orleans Saints
Mercedes-Benz Superdome
New Orleans, LA 70112

Carolina Panthers
Bank of America Stadium
Charlotte, NC 28202

New York Giants
MetLife Stadium
East Rutherford, NJ 07073

Chicago Bears
Soldier Field
Chicago, IL 60605

Cincinnati Bengals
Paul Brown Stadium
Cincinnati, OH

Cleveland Browns
FirstEnergy Stadium
Cleveland, OH 44114

Dallas Cowboys
Cowboys Stadium
Arlington, TX 76011

Denver Broncos
Sports Authority Field at Mile High
Denver, CO 80204

Detroit Lions
Ford Field
Detroit, MI 48226

Green Bay Packers
Lambeau Field
Green Bay, WI 54304

Houston Texans
NRG Stadium
Houston, TX 77054

Indianapolis Colts
Lucas Oil Stadium
Indianapolis, IN

Jacksonville Jaguars
EverBank Field
Jacksonville, FL 32202

Kansas City Chiefs
Arrowhead Stadium
Kansas City, MO 64129

New York Jets
MetLife Stadium
East Rutherford, NJ 07073

Oakland Raiders
O.co Coliseum
Oakland, CA 94621

Philadelphia Eagles
Lincoln Financial Field
Philadelphia, PA 19148

Pittsburgh Steelers
Heinz Field
Pittsburgh, PA 15212-5721

St. Louis Rams
Edward Jones Dome
St. Louis, MO 63101

San Diego Chargers
Qualcomm Stadium
San Diego, CA 92108

San Francisco 49ers
Levi's Stadium
Santa Clara, CA 95054

Seattle Seahawks
CenturyLink Field
Seattle, WA 98104

Tampa Bay Buccaneers
Raymond James Stadium
Tampa, FL 33607

Tennessee Titans
Nissan Stadium
Nashville, TN 37213

Washington Redskins
FedEx Field
Landover, MD 20785

NFL Practice Facilities

Arizona Cardinals
University of Phoenix Stadium
Glendale, AZ 85305

Atlanta Falcons
Atlanta Falcons Training Complex
Flowery Branch, GA 30542

Baltimore Ravens
Baltimore Ravens Under Armour Performance
Center
Owings Mills, MD 21117

Buffalo Bills
St. John Fisher College
Rochester, NY 14618

Carolina Panthers
Wofford College
Spartanburg, SC 29303-3663

Chicago Bears
Olivet Nazarene University
Bourbonnais, IL 60914

Cincinnati Bengals
Paul Brown Stadium
Cincinnati, OH 45202

Cleveland Browns
Cleveland Browns Training Facility
Berea, OH 44017

Dallas Cowboys
Marriott Residence Inn
Oxnard, CA 93036

Cowboys Center
Irving, TX 75063-4999

Denver Broncos
Paul D. Bowlen Memorial Broncos Center
Englewood, CO 80112

Miami Dolphins
Miami Dolphins Training Facility
Davie, FL 33314

Minnesota Vikings
Minnesota State University – Mankato
Mankato, MN 56001

New England Patriots
Gillette Stadium
Foxboro, MA 02035

New Orleans Saints
The Greenbrier
White Sulphur Springs, WV 24986

New York Giants
Quest Diagnostics Training Center
1925 Giants Drive
East Rutherford, NJ 07073

New York Jets
Atlantic Health Jets Training Center
Florham Park, NJ 07932

Oakland Raiders
Napa Valley Marriott Hotel
Napa, CA 94558

Philadelphia Eagles
NovaCare Complex/Lincoln Financial Field
Philadelphia, PA 19145

Pittsburgh Steelers
St. Vincent's College
Latrobe, PA 15650

UPMC Sports Performance Complex
Pittsburgh, PA 15203-2349

St. Louis Rams
Rams Park Training Facility
Earth City, MO 63045

Detroit Lions
Detroit Lions Training Facility
Allen Park, MI 48101

San Diego Chargers
Chargers Park
San Diego, CA 92123

Green Bay Packers
St. Norbert College/Don Hutson Center
Green Bay, WI 54304

San Francisco 49ers
SAP Performance Facility & Levi's Stadium
Santa Clara, CA 95054

Houston Texans
Houston Texans Practice Facility
Houston, TX 77054

Seattle Seahawks
Seattle Seahawks Headquarters Virginia
Mason Athletic Center
Renton, WA 98056

Indianapolis Colts
Anderson University
Anderson, IN 46012-3495

Tampa Bay Buccaneers
Tampa Bay Buccaneers Training Facility
Tampa, FL 33607

Indiana Farm Bureau Football Center
Indianapolis, IN 46254

Jacksonville Jaguars
EverBank Field
Jacksonville, FL 32202

Tennessee Titans
St. Thomas Sports Park
Nashville, TN 37228

Kansas City Chiefs
Missouri Western State University
St. Joseph, MO 64506

Washington Redskins
Bon Secours Washington Redskins Training
Center
Richmond, VA 23220

The pilot/operator shall coordinate with the FSDO having geographic responsibility over the area of the filming operations.

H. Plan of Activities

At least three (3) days prior to any scheduled filming, NFL Films shall submit a written plan of activities to the local FSDO having jurisdiction over the area of proposed filming. The plan of activities shall include the following:

- 1) Dates and times for all flights.
- 2) Name and phone number of operator responsible for the filming production event.
- 3) Name and phone number of the person responsible for the on-scene operation of the sUAS.
- 4) Make, model, and serial number or registration number of aircraft to be used and type of airworthiness certificate, including Category (CAT).

- 5) Names and certificate numbers of pilots involved in the filming production event.
- 6) A statement that permission has been obtained from property owners and/or local officials to conduct the filming production event; the list of those who gave permission will be made available to the inspector upon request.
- 7) Signature of exemption holder or a designated representative.
- 8) A general outline, description or summary of the flight activity schedule, including maps or diagrams of any area, city, town, country, and/or state over which filming will be conducted and the altitude essential to accomplish the operation.

At the discretion of the FSDO, the 3-day notification may be waived. Justification of the exception to the 3-day requirement is needed.

NFL Films acknowledges that prior to the beginning of any filming operations, the plan of activities must be accepted by the FAA.

I. Permission to Operate

Before any flight operation is conducted at less than 500 feet under the provisions of the certificate of waiver and this Manual, the operator will obtain permission to conduct these operations from property owners and local officials as necessary or appropriate. Persons from whom permission may be required are listed below:

- 1) Property owners
- 2) Law enforcement officials
- 3) Fire department officials
- 4) Local, state and federal government

The NFL Films personnel obtaining such permission will do so in writing whenever practical; however, verbal permission is acceptable otherwise. A standard permission form is provided in Appendix A and may be used when obtaining written permission. Written permission forms will be maintained at the job site until flight operations are completed, and then turned over to NFL Films to be kept on file for a minimum of six (6) months. These forms will be made available for inspection by the FAA or other official personnel upon request.

J. Security

Prior to any flight operation, the operator will coordinate with appropriate production personnel to devise a plan of securing the area(s) of operation from all unauthorized persons, vehicles and

aircraft. Provisions will be made to immediately discontinue operations should the area(s) become unsecured or for any other reason in the interest of safety.

K. Briefing of Pilots and Production Personnel

Prior to the start of any operation under the provisions of this Manual, the pilot in command will conduct a briefing of all procedures to participating personnel of the risks involved, emergency procedures, and safeguards to be following during the filming production event. Personnel will also be briefed on any additional provisions that may be issued by the local FSDO, including the location of boundaries or any other time limits.

L. Certification/Airworthiness

Prior to any flight operation, the pilot in command will conduct a pre-flight inspection in accordance with Title 14 of the Code of Federal Regulations (14 CFR) parts 43 and 91 and applicable operating limitations. The pre-flight inspection will 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 sUAS, the aircraft will be prohibited from operation until the necessary maintenance has been performed and the sUAS is found to be in a condition for safe flight.

NFL Films will follow the sUAS manufacturer's maintenance, overhaul, replacement, inspection and life limit requirements for the aircraft and aircraft components. Each sUAS operated under this exemption will comply with all manufacturer safety bulletins.

The aircraft to be used may be certificated in any CAT, including experimental, provided the requirements of 14 CFR part 91, §§ 91.7, 91.9, and 91.203 are met.

M. Pilot Personnel—Minimum Requirements

The pilot in command will hold either an airline transport, commercial, private, recreational, or sport pilot certificate. The PIC will 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 also will 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.

N. Limitations

Aircraft operations shall conform with the limitations set forth in NFL Films' request for a limited exemption, dated May 20, 2015, attached to this Manual as Appendix C.

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

The aircraft will not be operated during night, as defined in 14 CFR § 1.1.

O. Communications

Prior to the start of any operation covered by this Manual, the pilot in command will formulate a plan to provide communications capability to all participants during the actual operation and filming. Oral, visual or radio communications may be used as long as it is effective and is capable of keeping the participants continuously apprised of the current status of the operation.

P. Accident Notification

Should an accident or incident requiring notification of the NTSB occur, the operator would immediately notify the NTSB pursuant to 49 CFR § 830 and take steps to preserve and protect the accident scene.

Q. Recall/Stop Procedures

Radio communication, oral, visual or a combination will be utilized to keep the participants continuously apprised of the current status of operation.

R. Aerobatic Competency

If the filming operations require the issuance of FAA Form 8710-7, see Volume 5, Chapter 9, Section 1, Issue/Renew/Rescind a Statement of Acrobatic Competency.

Appendix A

NFL Films

Permission to Conduct Operations Form

In signing this form, I am giving NFL Films permission to operate its aircraft at less than 500 feet from property, or, in some jurisdiction in which I am responsible for or affiliated with, for the purpose of film or television production.

Name: _____

Title: _____

Location: _____

Date of
Operation: _____

Basis of Authority to Grant Permission:

Signature: _____

Date: _____

NFL Films Representative Receiving Permission:

Appendix B

NFL Films

List of Approved Aircraft

	Make and Model	Type	Weight
1	DJI Innovations Phantom 1	Quad-rotor	3 lbs. (inclusive of camera and battery)
2	DJI Innovations Phantom 2	Quad-rotor	3 lbs. (inclusive of camera and battery)
3	DJI Innovations Inspire 1	Quad-rotor	6 lbs. (inclusive of camera and battery)

Appendix C

NFL Films' Letter Requesting Limited Exemptions

COVINGTON

BEIJING BRUSSELS LONDON LOS ANGELES
NEW YORK SAN FRANCISCO SEOUL
SHANGHAI SILICON VALLEY WASHINGTON

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May 20, 2015

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

To Whom It May Concern:

Pursuant to Section 333 of the FAA Modernization and Reform Act of 2012 and 14 C.F.R., Part 11, NFL Productions LLC d/b/a NFL Films ("NFL Films"), operator of Small Unmanned Aircraft Systems ("sUAS") equipped to conduct aerial videography of professional football game and training facilities, requests a limited exemption from the below-listed regulations to allow commercial operation of its sUASs, provided that the proposed sUAS operations comply with the conditions outlined below or as established by the Federal Aviation Administration ("FAA") under Section 333.

The name and address of the applicant is: NFL Productions LLC, One Sabol Way, Mt. Laurel, N.J. 08054, c/o Barry M. Wolper, Chief Financial Officer, (856) 222-3545, barry.wolper@nfl.com.

NFL Films makes this request under the "summary grant" process that the FAA announced in April 2015.¹ This request is similar in all material respects to a number of recent grants of exemption, including Grant of Exemption No. 11488 to Advanced Aerial Cinematography, LLC (FAA Docket No. 2014-0090).²

Regulations from which the exemption is requested:

14 C.F.R. part 21

14 C.F.R. § 45.23 (b)

14 C.F.R. §§ 61.113 (a) & (b)

¹ See FAA Summary Grants Speed UAS Exemptions, *available at* <https://www.faa.gov/news/updates/?newsId=82485>.

² The use limitations and arguments in this application are nearly identical to those contained in Advanced Aerial Cinematography's November 24, 2014 application and the FAA's May 5, 2015 approval of that application.

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14 C.F.R. § 91.7 (a)

14 C.F.R. § 91.9 (b) (2)

14 C.F.R. § 91.103

14 C.F.R. § 91.109

14 C.F.R. § 91.119

14 C.F.R. § 91.121

14 C.F.R. § 91.151 (a)

14 C.F.R. §§ 91.203 (a) & (b)

14 C.F.R. § 91.405 (a)

14 C.F.R. 407 (a) (1)

14 C.F.R. § 409 (a) (2)

14 C.F.R. §§ 417 (a) & (b)

NFL Films proposes that it receive an exemption to use sUAS to gather footage from closed-set locations in and around NFL stadiums (on non-game days) and NFL practice facilities. NFL Films would use the footage for the production of television programs. NFL Films would obtain the consent of all personnel in the stadiums and practice facilities in the vicinity in which the sUAS may operate.

The proposed sUAS operation will be conducted safely to minimize risk to the national airspace system ("NAS") or to persons and property on the ground. NFL Films proposes that the exemption apply to civil aircraft that operate within the limitations listed below. These limitations were established in the FAA's grant of Advanced Aerial Cinematography's request for an exemption:

1. The sUAS will weigh 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 sUAS may not be operated at a speed exceeding 87 knots (100 miles per hour). NFL Films may use either groundspeed or calibrated airspeed to determine compliance with the 87 knot speed restriction. In no case will the UA

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be operated at airspeeds greater than the maximum UA operating airspeed recommended by the aircraft manufacturer.

4. The UA will be operated at an altitude of no more than 400 feet above ground level (AGL). Altitude will be reported in feet AGL.
5. The UA will be operated within visual line of sight (VLOS) of the Pilot in Charge (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 will utilize a visual observer (VO). The UA will be operated within the 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 the VLOS capability. The VO and PIC will be able to communicate verbally at all times; electronic messaging or texting will not be permitted during flight operations. The PIC will be designated before the flight and cannot transfer his or her designation for the duration of the flight. The PIC will ensure that the VO can perform the duties required of the VO.
7. This exemption and all documents needed to operate the sUAS and conduct its operations in accordance with the conditions and limitations stated in the grant of exemption, are hereinafter referred to as the operating documents. The operating documents will be accessible during sUAS operations and made available to the Administrator upon request. If a discrepancy exists between the conditions and limitations in the exemption and the procedures outlined in the operating documents, the conditions and limitations herein take precedence and will be followed. Otherwise, NFL Films will follow the procedures as outlined in its operating documents. NFL Films may update or revise its operating documents. It is NFL Films' responsibility to track such revisions and present updated and revised documents to the Administrator or any law enforcement official upon request. NFL Films will also present updated and revised documents if it petitions for extension or amendment to this grant of exemption. If NFL Films determines that any update or revision would affect the basis upon which the FAA granted this exemption, then NFL Films 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.

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9. NFL Films 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 will conduct a pre-flight inspection and determine the sUAS is in a condition for safe flight. The pre-flight inspection will 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 sUAS, the aircraft will be prohibited from operating until the necessary maintenance has been performed and the sUAS is found to be in a condition for safe flight.
11. NFL Films will follow the sUAS manufacturer's maintenance, overhaul, replacement, inspection, and life limit requirements for the aircraft and aircraft components.
12. Each sUAS operated under this exemption will comply with all manufacturer safety bulletins.
13. Under this grant of exemption, a PIC will hold either an airline transport, commercial, private, recreational, or sport pilot certificate. The PIC will 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 also will 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. NFL Films will not permit any PIC to operate unless the PIC demonstrates the ability to safely operate the sUAS in a manner consistent with how the sUAS 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 will 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 sUAS in a manner consistent with how the sUAS 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 will operate the UA with appropriate distance from nonparticipants in accordance with 14 CFR § 91.119.
15. UAS operations will not be conducted during night, as defined in 14 C.F.R. § 1.1. All operations will be conducted under visual meteorological conditions (VMC). NFL Films will not operate flights under special visual flight rules (SVFR).
16. The UA will not operate within 5 nautical miles of an airport reference point (ARP) as denoted in the current FAA Airport/Facility Director (AFD) or for airports not denoted with an ARP, the center of the airport symbol as denoted on

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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 will be made available to the Administrator or any law enforcement official upon request.

17. The UA will 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 sUAS loses communications or loses its GPS signal, the UA will return to a pre-determined location within the private or controlled-access property.
19. The PIC will abort the flight in the event of unpredicted obstacles or emergencies.
20. The PIC will be 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 will 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 will 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 will be as large as practicable.
23. Documents used by NFL Films to ensure the safe operation and flight of the sUAS and any documents required under 14 CFR §§ 91.9 and 91.203 will be available to the PIC at the Ground Control Station of the sUAS any time the aircraft is operating. These documents will be made available to the Administrator or any law enforcement official upon request.
24. The UA will remain clear and give way to all manned aviation operations and activities at all times.
25. The sUAS will not be operated by the PIC from any moving device or vehicle.
26. All Flight operations will 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. NFL Films will ensure that nonparticipating persons remain

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under such protection. If a situation arises where nonparticipating persons leave such protection and are within 500 feet of the UA, flight operations will 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, essential persons, or individuals who have signed consent forms are not considered nonparticipating persons under this exemption.

- 27. All operations will 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 will be reported to the FAA's UAS Integration Office (AFS-80) within 24 hours. Accidents will be reported to the National Transportation Safety Board (NTSB) per instructions contained on the NTSB Web site: www.nts.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. NFL Films will have a motion picture and television operations manual (MPTOM) as documented in this grant of exemption.
- 30. At least 3 days before aerial filming, NFL Films will 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 sUAS aerial filming conducted under this grant of exemption;
 - c. Name and phone number of the person responsible for the on-scene operation of the sUAS;
 - d. Make, model, and serial or N-Number of the sUAS to be used;

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- e. Name and certificate number of sUAS 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 will 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, the sUAS operations will comply with all applicable parts of 14 CFR including, but not limited to, parts 45, 47, 61, and 91. NFL Films incorporates all arguments in support of the petition made in Advanced Aerial Cinematography's November 24, 2014 application for exemption.

Federal Register Notice

As stated above, publication in the Federal Register is unnecessary because this application meets the FAA's criteria for summary approval. To the extent that the FAA determines that publication is necessary, the following summary is provided:

Applicant seeks an exemption from the following rules: 14 C.F.R. § 21, subpart H; 14 C.F.R. 45.23 (b); 14 C.F.R. § 61.113 (a) & (b); 91.7 (a); 91.9 (b)(2); 91.103 (b); 91.109; 91.119; 91.121; 91.151(a); 91.203 (a) and (b); 91.405 (a); 91.407 (a)(1); 91.409 (a)(2); 91.409 (a)(2) and 91.417 (a) & (b) to operate commercially a small unmanned vehicle (55 lbs or less) in videography operations.

The Exemption is in the Public Interest

As demonstrated above, the proposed sUAS operations would minimize the risk of harm to individual safety or damage to the NAS and property. The operations proposed by NFL Films would provide tremendous public benefits by enabling millions of NFL fans to view footage that could not be captured via any other technology. The sUAS operations as described in this application will be far safer and more efficient than use of helicopters or other aircraft to capture the required footage.

The conditions outlined in this petition clearly satisfy Section 333's exemption criteria regarding "size, weight, speed, operational capability, proximity to airports and populated areas, and operation within visual line of sight," and therefore the proposed operations would not

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“create a hazard to users of the national airspace system or the public or pose a threat to national security.” As discussed above, NFL Films agrees to use limitations that are substantially identical to those contained in the FAA’s recent grant of exemption for Advanced Aerial Cinematography. Accordingly, the proposed UAS operations of NFL Films should not raise safety or national security concerns, and should receive summary approval.

Please do not hesitate to contact the undersigned if you need additional information.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Kurt Wimmer", with a long horizontal flourish extending to the right.

Kurt Wimmer
Jeff Kosseff