



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

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

July 15, 2015

Exemption No. 12057
Regulatory Docket No. FAA-2015-1564

Mr. Ryan Nolin
439 Lancelot Lane
Lexington, KY 40517

Dear Mr. Nolin:

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

By letter dated April 25, 2015, you petitioned the Federal Aviation Administration (FAA) for an exemption. The petitioner requested to operate an unmanned aircraft system (UAS) to conduct precision imaging for agricultural, forestry, wildlife management and survey industries.

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 is an Event 38 E384.

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. 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, Mr. Ryan P. Nolin 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, Mr. Ryan P. Nolin 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 Event 38 E384 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.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 July 31, 2017, unless sooner superseded or rescinded.

Sincerely,

/s/

John S. Duncan

Director, Flight Standards Service

Enclosures

April 25, 2015

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

Regarding Exemption Request of the FAA Reform Act and Part 11 of the Federal Aviation Regulations

Attachments: A) E384 Maintenance Manual
B) E384 Operations Manual
C) E384 Training Syllabus

Dear Sir or Madam:

Ryan Nolin, an unmanned aircraft systems (UAS) consultant, and UAS operator, is requesting an exemption from the Federal Aviation Regulations listed below pursuant to section 333 of the FAA Modernization and Reform Act of 2012.

The granted exemptions would allow Ryan Nolin to safely and properly operate small Unmanned Aircraft Systems (sUAS) for the commercial purpose of precision imaging for agricultural, forestry, wildlife management and survey industries. By following the procedures outlined in this document and attached appendices or established by the FAA, Ryan Nolin believes an equivalent level of safety can be achieved to current Federal Aviation Regulations (FARs).

Because the sUAS Ryan Nolin plans to operate (Event 38 E384) weighs less than 10lbs, is made of foam, and is electric powered, operations produce less noise, less air pollution and congestion in the National Airspace (NAS). These reasons are all in the well being of the general public.

Being a sUAS also has the added benefit of reducing risks to personnel and property in the air and on the ground. Because flight operations will require consent from landowners, operate below 500 feet and operate in a similar fashion to current manned aircraft no new privacy issues will arise.

The requested exemption is in the public interest of our nation. By granting this exemption Ryan Nolin, the public and surrounding communities will all benefit from added economic, environmental and positive sUAS outlook impacts.

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The Specific sections of 14 CFR from which Ryan Nolin seeks exemption:

14 C.F.R Part 21 Subpart H
14 C.F.R 61.113 (a)&(b)
14 C.F.R 91.7 (a)
14 C.F.R 91.151
14 C.F.R 91.405 (a)
14 C.F.R. 91.407 (a)(1)
14 C.F.R. 91.409 (a)(1) & (a)(2)
14 C.F.R 91.417 (a) (b)

Appendix A discusses why each C.F.R is appropriate for exemption, how an equivalent level of safety is achieved and how it is in the public's interest.

Characteristics of the Aircraft:

Ryan Nolin will operate the E384 fixed wing sUAS, which is manufactured by Event38 of Akron, Ohio. The principle construction material for the E384 airframe is EPO foam, carbon fiber tail boom with an all up weight (AUW) no greater than 10lbs. The E384 is powered by a single lithium polymer battery that drives a single brushless motor. The E384 has a maximum flight time of 100 minutes with operating speed of 27 mph. The pilot in command (PIC) will communicate with the E384 with a 2.4 ghz remote control radio and a 915mhz data telemetry radio connected to a ground control (GC) computer.

The E384 aircraft has several failsafe systems in place:

- In the event of the loss of remote control (unlikely due to visual line of sight (VLOS) operations under 400ft) the E384 will perform a "return to home" command.
- In the event of the loss of ground control connection (unlikely due to VLOS operations under 400ft) the E384 will perform "return to home" command.
- In the event of a low battery (less than 20%) the E384 will perform a "return to home" command.

In addition to the above failsafes, a gps guided "Geofence" will prevent the E384 from flying beyond its intended flight path.

Ryan Nolin holds an Airframe and Powerplant certificate (#3474636) and will thus perform all E384 maintenance. Maintenance procedures will be followed in accordance with Event38 maintenance manuals (attachment A). All maintenance procedures will be logged.

Similar aircraft is already approved for operation. See exemption #11166

Proposed procedural and operational standards

Pilot In Command (PIC) and Visual Observer

- As PIC, Ryan Nolin will have at minimum a Sport Pilot's license.
- A visual observer (VO) will maintain contact with the PIC and be used to ensure the E384 remains in VLOS and will fully understand all operating limitations set forth in this petition.
- Flights will be conducted during day-light hours and under Visual Flight Rules (VFR).
- Flights will be conducted within VLOS of the PIC and VO.
- As PIC, Ryan Nolin will complete Event 38 training for the E384 aircraft in accordance with the Event38 training syllabus (attachment C).
- As PIC, Ryan Nolin will be responsible for all aircraft and preflight inspections.

Flight Operational Limits

- All required permissions/permits from governmental agencies will be obtained prior to each flight.
- Permission from relevant property owners will be obtained prior to each operation.
- Preflight Safety briefings will be conducted before each flight to discuss potential safety hazards and operational boundaries.
- Flight plans will not extend past the 100-minute flight limit of the E384 aircraft.
- All flights will be conducted no more than 400 feet above ground level (AGL) and 5 miles from any airport.
- All flight operations will be conducted at least 500 feet from all nonparticipating persons, vessels, vehicles, and structures.
- Operations over congested areas will be avoided.
- The E384 will take off and land next to the PIC and VO.
- Alternate emergency landing zones will be established during the preflight safety briefing.
- The E384 will always give way to manned aircraft.
- A ground control station will always be present in the area of the PIC and VO to relay real-time E384 information, such as battery level, altitudes, speeds, location and global positioning system (GPS) health.
- Certificates of Approval (COA) will be secured before each flight as required by FAA regulations.
- The PIC will abort flights in the event of obstacles or emergencies.
- The E384 aircraft will be registered in accordance with 14CFR Part 47 and have identification (N-Number) markings in accordance with 14 CFR part 45, Subpart C. Markings will be as large as practical.
- All documents used by the operator to ensure safe operation and flight of the E384 will be available to the PIC at the ground control station of the sUAS anytime the aircraft is operating.

Safety in the National Airspace and on the ground is the priority for operations. By following the above guidelines, in addition to Event 38 Operations Manual (attachment B), Ryan Nolin is confident an equal or greater level of safety to current manned aviation is achieved.

See similar operations that have been granted exemptions: #11062, #11109, #11166, #11213, #11379, #11285

Appendix A

Specific Sections of 14 CFR from which Ryan Nolin Seeks Exemption

Below are the sections from which Ryan Nolin seeks exemption, with specifics on the extent of relief sought, reason for relief, and why exemption would not adversely affect safety.

Part 21 Subpart H – Airworthiness Certification

Part 21 Subpart H establishes the requirements for the issuance of an airworthiness certificate. Ryan Nolin seeks complete exemption from Part 21 Subpart H pursuant with Section 333, which authorizes the FAA to exempt a UAS from the requirements of an airworthiness certificate based on consideration of the following: size, weight, speed, operational capability, proximity to airports and populated areas, and operation within VLOS.

An equal level of safety will be achieved with the operational limitations established in this document (refer to page 3 of the Event38 Operational limitations (attachment B)) for all E384 flights conducted by Ryan Nolin. The E384 sUAS operates with an all up weight (AUW) of less than 10lbs and maximum airspeed of 30mph. All flights will occur within VLOS of the PIC and VO, at an altitude of 400 ft. AGL or less, and only over designated areas. Based on the required standards and limitations the E384 can safely operate without creating a hazard to any other aircraft, people, or structures on the ground.

Similar aircraft is already approved for operation. See Exemption #11166

61.113 (a) – Private Pilot Privileges and Limitations; Pilot In Command: Commercial Pilot Privileges and Limitations

Sections 61.113 (a) & (b) limit private pilots to non-commercial operations. Due to its size, weight, and operational limitations the E384 sUAS will not carry any persons on board. The proposed operations will not adversely affect safety by requiring the PIC of aircraft to have a commercial pilot certificate, as long as they have passed, at minimum, a sport pilots certification. The safe operation of a sUAS benefits more from hands on experience and training in comparison to a commercial pilot's license. Ryan Nolin respectfully states that, since there are no standards for either private or commercial UAS pilot certificates, knowledge of airspace regulations and dexterity in the control and operation of the UAS acquired from actual operation of the aircraft will

be the most important factors in establishing an equivalent level of safety. By following the Event38 training syllabus (attachment C) with the E384 sUAS the proper knowledge of airmanship can be achieved to maintain safe flight operations.

91.121 – Altimeter Settings

91.121 requires aircraft to maintain a cruising level or flight level in reference to a current reported altimeter setting. The altitude information on E384 is provided to the PIC via a barometric pressure sensor, Global Positioning System (GPS) equipment, and a radio communication telemetry data link, which downlinks from the E384 sUAS to the GCS for active monitoring of the flight path.

Also since the E384 will be operating at or below 400 ft. AGL, there is no need to maintain hemispherical cruising altitudes for de-confliction with manned aircraft. For these reasons Ryan Nolin seeks exemption from this regulation.

During arming sequence the E384 sets a reference AGL altitude at home locations using GPS and barometric pressure sensors. An equal level of safety will be achieved through the E384's GPS and flight control, which provides altitude and location data during flight to the PIC via the ground control station. The previous safety protocols are outlined in the Preflight checklist within the Event 38 Operations Manual. Checking the GPS read-out ensures that it's within tolerance prior to commencing flight operations. This, combined with the fact that the aircraft's altitude will be visually monitored by the PIC and Safety Observer, ensures an equal level of safety is achieved without referencing an altimeter setting. Furthermore, by operating at or below 400 ft. AGL the E384 sUAS will not create a hazard to any manned aircraft.

91.151-Fuel Requirements for Flight in VFR Conditions

91.151 provides that no person may begin a flight in an airplane under day visual flight reference (VFR) conditions unless there is enough fuel to fly to the first point of intended landing and to fly after that for at least 30 minutes. Because the E384 sUAS is electric-powered, this requirement is inapplicable. Safety features on E384 prevent arming and take-off in "Low battery" conditions as well as "return to launch" during "low battery" conditions. These features, teamed with the small size and weight of the UAV should more than achieve an equivalent level of safety.

14 CFR Subpart E (91.401 - 91.417): Maintenance, Preventive Maintenance, and Alterations

91.405 (a)-States that the an aircraft operator or owner shall have that aircraft inspected as prescribed in subpart E of the same part and shall, between required inspections, except as provided in paragraph (c) of the same section, have discrepancies repaired as prescribed in part 43 of the chapter.

91.407 (a) (1)-Specifies that no person may operate any aircraft that has undergone maintenance, preventive maintenance, rebuilding, or alteration unless it has been approved for return to service by a person authorized under § 43.7 of this chapter.

91.409 (a) (1) (2)- Specifies, in pertinent part, that no person may operate an aircraft unless, within the preceding 12 calendar months, it has had—

(1) An annual inspection in accordance with part 43 and has been approved for return to service by a person authorized by Sec. 43.7

(2) An inspection for the issuance of an airworthiness certificate in accordance with part 21.

91.417 (a) (b)-requires the owner or operator to keep records showing certain maintenance work that has been accomplished by certificated mechanics, under Part 43, or licensed pilots and records of approval of the aircraft for return to service.

Ryan Nolin seeks full exemption from sections (91.405 (a), 91.407 (a), 91.409 (a)(1,2)), 91.417 (a,b) due to the fact that these sections apply to an aircraft with an airworthiness certificate for which Ryan Nolin is already seeking exemption.

An equal level of safety will be achieved by using the E384 Operations Manual (Reference Attachment B) and E384 Maintenance Manual (Reference Attachment A) which provide instructions for preventive and corrective aircraft maintenance. The PIC will be responsible for conducting maintenance in accordance with these procedures. Ryan Nolin, with the knowledge learned as a licensed Airframe and Powerplant mechanic (License #3474636), will ensure that all preventive and corrective maintenance performed on the E384 sUAS will be documented.

Summary for Federal Register

Pursuant with section 333 of the FAA Modernization and Reform Act of 2012, Ryan Nolin seeks exemption from the following Federal Aviation Regulations that are found under Title 14 of the Code of Federal Regulations: Part 21 Subpart H, 61.113 (a)&(b), 91.151, 91.405 (a), 91.407 (a)(1), 91.409 (a)(1) & (a)(2), 91.417 (a)(b). Granted exemptions from these regulations would allow Ryan Nolin to safely and properly operate the E384 sUAS for the commercial purpose of precision imaging for agricultural, forestry, wildlife management and survey industries.

Ryan Nolin is prepared to modify or amend any part of this request to satisfy the need for an equivalent level of safety. Ryan Nolin can be contacted at any time (see contact information below) if you require additional information or clarification.

Respectfully,



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