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January 8, 2015

U.S. Department of Transportation
Docket Management System
1200 New Jersey Ave., SE
Washington, DC 20590
Re: Exemption Pursuant to Section 333

Dear Mr. Pappas,

I am seeking relief from the following 14 CFR's:

1. 91.7(a)
2. 91.119(c)
3. 91.121
4. 91.151(a)
5. 91.405(a)
6. 91.407(a)(1)
7. 91.409(a)(1) and (2)
8. 91.417(a) and (b)

I would like to operate the PHANTOM 2 Vision+ quad-copter unmanned aircraft system (UAS) in Central Iowa to conduct aerial videography and cinematography to enhance academic community awareness for those individuals and companies unfamiliar with the geographical layout of Central Iowa and augment real estate listing videos.

I have been a CPL since 2004 with over 3,000 hours of Flight Time and currently hold a First Class medical certificate. I also have held an active CFI license since 2004. Over the last nine years, I oversaw flight operations for an aerial mapping company using fixed-wing aircraft. Currently, I am employed with a real estate services business called Hunziker Companies with hopes to utilize a UAS. Over the past two years, I have also been practicing with a rotorcraft UAS and have amassed an estimated 50 hours of Flight Time.

Below are the regulations I am seeking relief from and reason:

91.7(a) – I believe that since no FAA regulatory standard exists for determining airworthiness of the UAS, the regulation is inapplicable.

91.119(c) - Operations will need to occur at altitudes under 300 feet and closer than 500 feet to persons or objects.

91.121 – The system has a barometric altimeter and GPS derived altitude capabilities while the FAA requires any altitude reported to ATC to be in feet AGL.

91.151(a) – The system does not have the capabilities to adhere to this regulation.

91.405(a) – This section doesn't pertain to a UAS.

91.407(a)(1) – This section doesn't pertain to a UAS.

91.409(a)(1) and (2) – This section doesn't pertain to a UAS.

91.417(a) and (b) – This section doesn't pertain to a UAS.

I would be happy to comply with the following conditions:

1) Operations authorized by this grant of exemption are limited to the following aircraft described in the operating documents which is a quad-rotor aircraft weighing less than 3 pounds: PHANTOM 2 Vision+ Unmanned Aircraft System. Proposed operations of any other aircraft will require a new petition or a petition to amend this grant.

2) The UA may not be flown at an indicated airspeed exceeding 30 knots.

3) The UA must be operated at an altitude of no more than 300 feet above ground level (AGL), as indicated by the procedures specified in the operating documents. All altitudes reported to ATC must be in feet AGL.

4) The UA must be operated within visual line of sight (VLOS) of the Pilot In Command (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.

5) All operations must utilize a visual observer (VO). The UA must be operated within the visual line of sight (VLOS) of the 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. 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 functions prescribed in the operating documents.

6) The operating documents and this grant of exemption 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 upon request. The operator must also present updated and revised documents if he 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 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.

7) Prior to each flight, the PIC must inspect the UAS to ensure it is in a condition for safe flight. If the inspection reveals a condition that affects the safe operation of the UAS, the UAS is prohibited from operating until the necessary maintenance has been performed and the UAS is found to be in a condition for safe flight. The Ground Control Station must be included in the preflight inspection. All maintenance and alterations must be properly documented in the aircraft records.

8) Any UAS 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. The PIC who conducts the functional test flight must make an entry in the aircraft records.

9) The pre-flight inspection section in the operating documents must account for all discrepancies, i.e. inoperable components, items, or equipment, not already covered in the relevant sections of the operating documents.

10) The operator must follow the UAS manufacturer's aircraft/component, maintenance, overhaul, replacement, inspection, and life limit requirements.

11) The operator must carry out its maintenance, inspections, and record keeping requirements, in accordance with the operating documents. Maintenance, inspection, and alterations must be noted in the aircraft records, including total flight hours, description of work accomplished, and the signature of the authorized person returning the UAS to service.

12) Each UAS operated under this exemption must comply with all manufacturer Safety Bulletins.

13) The authorized person must make an entry in the aircraft record of the corrective action taken against discrepancies discovered between inspections.

14) UAS operations must be conducted by a PIC possessing at least a private pilot certificate and at least a current third-class medical certificate. 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.

15) Prior to operations conducted for the purpose of aerial videography/cinematography and augmenting real estate listing videos (or similar operations), the PIC must have accumulated and logged, in a manner consistent with 14 CFR 61.51(b), a minimum of 25 hours of total time as a UAS rotorcraft pilot including at least 10 hours logged as a UAS pilot with a multi-rotor UAS. Prior documented flight experience that was obtained in compliance with applicable regulations may satisfy this requirement. Training, proficiency, and experience-building flights can also be conducted under this grant of exemption to accomplish the required flight time. However, said training operations may only be

conducted during dedicated training sessions. During training, proficiency, and experience-building flights the PIC is required to operate the UA with appropriate distances in accordance with 14 CFR 91.119.

16) Prior to operations conducted for the purpose of aerial videography/cinematography and augmenting real estate listing videos (or similar operations), the PIC must have accumulated and logged, in a manner consistent with 14 CFR 61.51(b), a minimum of 5 hours as UAS pilot operating the make and model of the UAS to be used in operations under the exemption; 5 hours make and model time may be included in the 10 hours of multi-rotor time prescribed above. The PIC must accomplish 3 take-offs and landings in the preceding 90 days (for currency purposes). Training, proficiency, experience-building, and take-off and landing currency flights can be conducted under this grant of exemption to accomplish the required flight time and 90 day currency. However, said training operations may only be conducted during dedicated training sessions. During training, proficiency, and experience-building flights the PIC is required to operate the UA with appropriate distances in accordance with 14 CFR 91.119.

17) The operator may not permit the PIC to operate the UAS for the purpose of aerial videography/cinematography and augmenting real estate listing videos (or similar operations), unless the PIC has demonstrated and logged in a manner consistent with 14 CFR 61.51(b), 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 people, vessels, vehicles and structures.

18) 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).

19) The UA may not operate within 5 nautical miles of an airport reference point as denoted on a current FAA-published aeronautical chart.

20) 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.

21) If the UA loses communications or loses its GPS signal, it must return to a pre-determined location within the planned operating area and land or be recovered in accordance with the operating documents.

22) The PIC must abort the flight in the event of unpredicted obstacles or emergencies in accordance with the operating documents.

23) The PIC is prohibited from beginning a flight unless (considering wind and forecast weather conditions) there is enough power to fly at normal cruising speed to the intended landing point and land the UA with 30% battery power remaining.

24) The operator must obtain an Air Traffic Organization (ATO) issued Certificate of Waiver or Authorization (COA) prior to conducting any operations under this grant of exemption. This COA will also

require the operator to request a Notice to Airman (NOTAM) not more than 72 hours in advance, but not less than 48 hours prior to the operation.

25) 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.

26) Before conducting operations, the radio frequency spectrum used for operation and control of the UA must comply with the Federal Communications Commission (FCC) or other appropriate government oversight agency requirements.

27) The 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 UAS is operating. These documents must be made available to the Administrator or any law enforcement official upon request.

28) The UA must remain clear and yield the right of way to all manned aviation operations and activities at all times.

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

30) The UA may not be operated over congested or densely populated areas.

31) 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 and/or;

b. The aircraft is operated near vessels, vehicles or structures where the owner/controller of such vessels, vehicles or structures has granted permission 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, and;

c. Operations nearer to the PIC, VO, operator trainees or essential persons do not present an undue hazard to those persons per § 91.119(a).

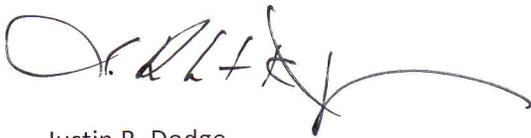
32) All operations shall be conducted over private or controlled-access property with permission from the land owner/controller or authorized representative. Permission from land owner/controller or authorized representative will be obtained for each flight to be conducted.

33) 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.

Along with this petition, I am submitting the PHANTOM Flying Flow Chart, PHANTOM Quick Start Manual and the PHANTOM 2 Vision+ User Manual.

If more information or documentation is needed to approve this exemption, please contact me at 515.239.8676.

Thank you for your consideration,

A handwritten signature in black ink, appearing to read "Justin R. Dodge". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Justin R. Dodge
Development Coordinator
Hunziker Companies