



July 1, 2014

Docket Operations, M-30 (Docket # FAA-2014-0354)
U.S. Department of Transportation (DOT)
1200 New Jersey Avenue SE, Room W12-140
West Building Ground Floor
Washington, DC 20590-0001
[Submitted electronically via the Federal eRegulations Portal]

SUBJECT: Exemption Request of HeliVideo Productions LLC under Section 333 of the FAA Reform Act and Part 11 of the Federal Aviation Regulations from 14 C.F.R. 45.23(b); 14 CFR Part 21; 14 CFR 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) & (b); 91.405 (a); 91.407(a) (1); 91.409 (a) (2); 91.417 (a) & (b).

The U.S. aerospace industry recognizes the increasingly clear benefits of the integration of small unmanned aircraft systems (sUAS) into the National Airspace System (NAS). The recent decision by the FAA to allow certain interim commercial UAS operations prior to the issuance of small UAS rule is welcomed by the Aerospace Industries Association (AIA). AIA believes the recent petitions for exemption, under Section 333, of the FAA Modernization and Reform Act, provide an excellent opportunity for the aviation community to take a safe and logical step forward. We strongly support safe and authorized use of unmanned aircraft in the motion picture industry and believe that granting the requested exemption is in the public interest.

AIA has reviewed the applicant's justification in support of their petition. It is clear that the focus of the petitioner is on safe UAS operations, aligned with FAA's legitimate concerns for the safety of both manned and unmanned aircraft. Their proposed actions to ensure safe sUAS operations are sound and very much consistent with the safety focus of the FAA. Specifically, the applicant has proposed to:

- Strictly limit the amount of airspace needed;
- Tightly control access to that airspace and the ground beneath it, so as to minimize risk to the public;
- Educate all personnel who would be subject to any degree of risk due to UAS operation; and
- Employ licensed airmen to control the aircraft.

The above are only a few of the pro-active measures the petitioner have offered to reassure FAA, its own employees, and the public at large that safety is their top priority. In fact, AIA believes that sUAS could lead to increased safety on movie sets, especially when one considers the maneuvers that a manned helicopter might employ to capture footage similar to that available from UAS.

Lastly, AIA believes that granting of the requested exemption would be in the public interest. Many locations have initiated economic incentive programs to attract the precious business opportunities that the motion picture industry provides. Looking globally, as other nations further develop their own film industries, and issue more favorable regulations with respect to the use of UAS technology, they are able to offer increasingly competitive economies to this industry, which had its beginnings in America. In the absence of the necessary regulations or an impending Notice of Proposed Rulemaking (NPRM), the potential beneficiaries of this technology in the U.S. are left waiting while the same opportunities arise abroad. Rational use of exemption authority that both ensures safe UAS operations in highly controlled situations and has the potential to spur economic growth is definitely in the public interest.

Each of the aircraft listed in these dockets are examples of American ingenuity that remains latent until FAA grants the exemptions or—even better—meets the congressional mandate expressed in Public Law 112-95 requiring a final rule by August 2014. At very least, granting these exemptions will provide the FAA with needed data to prove the safety of UAS operations. AIA supports the petitioner's request and encourages the Agency to grant the this exemption in a timely manner.

Respectfully,



Ali Bahrami
Vice President, Civil Aviation
Aerospace Industries Association