## VDOS GLOBAL LLC

June 2, 2014
Attention: United States Secretary of Transportation
Mr. Anthony Foxx
1200 New Jersey Ave, SE
Washington DC, 20590

Dear Mr. Secretary,

In accordance with Section 333(c) of the Federal Aviation Administration Modernization and Reform Act of 2012, VDOS Global LLC is requesting permission to use its Aeryon SkyRanger small unmanned vertical lift system to perform flare stack inspections for Shell Oil Company in the Gulf of Mexico for a period of 24 months.

The attached documentation contains waiver requests per 14 CFR Part 11 and corresponding explanations of why these exemptions are in the public interest and maintain at least an equal level of safety to existing regulations. Also attached is a Operations Guide outlying the operations, procedures, and Aeryon SkyRanger operating system.

VDOS Global LLC will be responsible to ensure compliance with applicable Federal Aviation Regulations and International Civil Aviation Organization regulations in relation to this operation. A "best practice" policy will be assumed toward regulations that are not applicable to this operation. Individuals performing this operation will all hold at least a current Federal Aviation Administration Commercial Pilots License and a valid FAA Class II Medical Certificate.

Performing these inspections with unmanned systems is a benefit to the public interest in several ways:

i) The operation significantly improves safety and reduces risk by alleviating human exposure to danger.

- ii) There is a compelling need to improve such inspection processes and save operating costs.
- iii) This service can provide a means of environmental monitoring during inspections. These unmanned inspections will aid in documenting and ensuring the structure emissions process is working properly and that harmful gases are not being released into the environment.

iv) VDOS Global LLC is prepared to share operational data with the FAA.

It is the hope of VDOS Global LLC that this request for flight approval in accordance with Section 333(c) of the Federal Aviation Administration Modernization and Reform Act of 2012 will be granted. It is with the knowledge of and respect for current airspace operations that we request this exemption to provide flare stack inspections commercially to the Shell Oil Company in the Gulf of Mexico.

Very Respectfully,

Brian Whiteside

President, VDOS Global LLC