

ETAK Systems, Inc.  
4045 Perimeter West Dr.  
Suite 600  
Charlotte, NC 28214  
Phone: (704) 398-9941  
Fax: (704)398-8539

November 3, 2014

U.S. Department of Transportation (DOT)  
Docket Operations, M-30  
1200 New Jersey Avenue., SE  
Room W12-140, West Building Ground Floor  
Washington, DC 20590-0001

**Re: Exemption Request**

To whom it may concern,

In agreement with Section 333 of the FAA Modernization and Reform Act of 2012 and 14 C.F.R. Part 11, ETAK Systems, Inc. (ETAK), an operator of a small Unmanned Aircraft System (sUAS) for cellular tower and compound observation in the telecommunication industry, seeks an exemption from the Federal Aviation Regulations (FARs) to allow commercial operations of its sUAS.

ETAK's requested exemption would permit the operation of a sUAS under controlled conditions in cellular tower airspace that is: (i) limited, (ii) predetermined, (iii) subject to controlled access through our customers, and (iv) provides greater safety in connection with aircraft operations in the telecommunication industry. ETAK believes that an exemption in the telecommunication industry would enhance safety and fulfill the Secretary of Transportation's (the FAA Administrator's) responsibilities to establish safe operations of sUAS.

According to Wireless Estimator, since 2003 there have been a total of 118 tower fatalities, not including tower related injuries. ETAK's mission is to provide safer tower services to the telecommunication industry. With ETAK's sUAS, we will be able to provide services that would limit the need of a tower climber which will save lives. Through ETAK's sUAS, we will be able to observe and acquire valuable data for our customers that would otherwise be more expensive and hazardous to individuals. Using the sUAS ETAK will prevent climbers from making unnecessary climbs and keep climbing purposes to installation/repair. The purpose of this petition is to improve safety at the cellular locations by eliminating tower climbing for visual/tower height measurement purposes.

ETAK is a United States Department of Transportation categorized utility company specializing in providing Engineering Audits, DC Power, and Battery services to major wireless providers across the continental United States. ETAK's sUAS flights will be flown to achieve an aerial view and video recording of wireless provider antennas and lines that are secured to vertical towers (also commonly

known as cell phone towers). ETAK's sUAS flights will also be used to view and record open antenna locations on towers for potential future modifications and additions.

Video data captured from the flights will be analyzed as follows: any site damage including: lightning strikes, FAA mandated tower strobe lights, shelter and cabinet roofs, ice bridge infrastructure, and coax cable tears. The characteristics of a cell tower (tall, pointy-shaped, and isolated) make it desirable for lightning strikes. Lightning strikes can damage ground equipment and antennas attached to the tower. Sending a sUAS to view and record the physical status of antennas saves multiple trips up and down the tower that are currently performed by technicians. Lightning strikes can also affect the strobe lighting on the tower. Strobe lighting is used to identify a tower in darkness or in bad weather conditions for low flying airplanes or aircrafts. Without properly functioning strobe lighting, towers and more importantly low flying aircrafts could be at risk of hitting a cell tower. While observing the tower, the equipment shelter and cabinets will also be viewed. By viewing the roofs of the shelters and cabinets, damage from falling tree limbs or leaks from weather damage can be assessed before being repaired. The same goes for the ice bridges as well. The ice bridge protects the coaxial cables leaving the shelter or cabinet to the antennas from falling tree limbs, snow and ice, tools from tower climbers, and debris or equipment falling from the tower. From the ground, a minimum amount of damage can be observed. Most auditors and technician would not have proper safety equipment on hand to properly assess the shelter and cabinet roofs as well as the ice bridges. With a sUAS flight, these damages can be assessed easily and safely.

The sUAS will also be observing the customer specific antenna array or RAD center on the tower. With the sUAS, height of the antenna array on the tower can be measured easily for future upgrades to the antennas and for coax cable length estimations. New antenna array locations can also be determined and if the sUAS is positioned successfully, the mechanical down-tilt of the antennas can be measured. For every flight that ETAK performs, all the above parameters will be checked for the providers, consumers, and bystanders safety concerns in mind. Cell phone towers are highly restricted areas and the potential for consumers or bystanders to be in the area is very low. Cell phone towers are also highly restricted from any and all air traffic and have minimal to zero likelihood of nearby aircraft.

Information Supporting this Petition as Specified in 14 C.F.R. §11.81

***(a) Your name and mailing address and, if you wish, other contact information such as a fax number, telephone number, or e-mail address;***

ETAK Systems, Inc.  
Charlie Terry  
Engineering Department  
Re: Exemption Request  
4045 Perimeter West Dr.  
Suite 600  
Charlotte, NC 28214  
Phone: (704) 398-9941  
Fax: (704)398-8539  
Email: [cterry@etaksystems.com](mailto:cterry@etaksystems.com)

***(b) The specific section or sections of 14 C.F.R. from which ETAK seeks an exemption***

- 21 – Subpart H Certification procedures for products and parts, Airworthiness Certificates
- 45.23 – Display of marks; general
- 61.113 - Private pilot privileges and limitations: Pilot in command
- 91.103 – Preflight Actions
- 91.105 – Flight crewmembers at stations
- 91.109 – Flight instruction; Simulated instrument flight and certain flight tests
- 91.119 – Minimum safe altitudes: General
- 91.121– Altimeter settings
- 91.151– Fuel requirements for flights in Visual Flight Rules (VFR) conditions
- 91.203 – Civil aircraft: certification required
- 91.405 – Maintenance required
- 91.407 – Operation after maintenance, preventative maintenance, rebuilding, and alteration
- 91.409 – Inspections
- 91.417 – Maintenance records

We believe an exemption from the above regulations will allow ETAK to conduct the needed work as described above.

***(c) The extent of relief ETAK seeks, and the reason ETAK seeks the relief***

ETAK seeks an exemption for several provisions of 14 C.F.R. Parts 21, 45, 61, and 91 to the extent to operate small UASs around cellular towers and compound facilities.

ETAK seeks exemption from 14 C.F.R. 21, Subpart H which states the certification procedures for products and parts as well as airworthiness certificates. Due to the limited airspace that ETAK will be using at cellular locations across the country, we are seeking exemption to the airworthiness certification process. ETAK has developed our own training procedures and regulations to promote and provide safe flying experiences for our PIC(s) which can be viewed in section (e) of this petition.

ETAK seeks exemption from 14 C.F.R. 45.23, which discusses the display of marks. Specifically, section 45.23 states, “(a) each operator of an aircraft must display on that aircraft marks consisting of the Roman capital letter “N” (denoting United States registration) followed by the registration number of the aircraft. Each suffix letter used in the marks displayed must also be a Roman capital letter (b) when marks include only the Roman capital letter “N” and the registration number is displayed on limited, restricted or light-sport category aircraft or experimental or provisionally certificated aircraft, the operator must also display on that aircraft near each entrance to the cabin, cockpit, or pilot station, in letters not less than 2 inches nor more than 6 inches high, the words “limited,” “restricted,” “light-sport,” “experimental,” or “provisional,” as applicable”. ETAK will need exemption from this regulation due to the small size of the aircraft and that there is no cabin, cockpit, or pilot station for the aircraft.

ETAK seeks exemption from 14 C.F.R. 61.113, which discusses private pilot privileges and limitations for the Pilot in command (PIC). Specifically, section 61.113 states “(a) Except as provided in paragraphs (b) through (h) of this section, no person who holds a private pilot certificate may act as pilot in command of an aircraft that is carrying passengers or property for compensation or hire; nor may that person, for compensation or hire, act as pilot in command of an aircraft. (b) A private pilot may, for compensation or hire, act as pilot in command of an aircraft in connection with any business or employment if: (1) The flight is only incidental to that business or employment; and (2) The aircraft does not carry passengers or property for compensation or hire (c) A private pilot may not pay less than the pro rata share of the operating expenses of a flight with passengers, provided the expenses involve only fuel, oil, airport expenditures, or rental fees. (d) A private pilot may act as pilot in command of a charitable, nonprofit, or community event flight described in §91.146, if the sponsor and pilot comply with the requirements of §91.146. (e) A private pilot may be reimbursed for aircraft operating expenses that are directly related to search and location operations, provided the expenses involve only fuel, oil, airport expenditures, or rental fees, and the operation is sanctioned and under the direction and control of: (1) A local, State, or Federal agency; or (2) An organization that conducts search and location operations. (f) A private pilot who is an aircraft salesman and who has at least 200 hours of logged flight time may demonstrate an aircraft in flight to a prospective buyer. (g) A private pilot who meets the requirements of §61.69 may act as a pilot in command of an aircraft towing a glider or unpowered ultralight vehicle. (h) A private pilot may act as pilot in command for the purpose of conducting a production flight test in a light-sport aircraft intended for certification in the light-sport category under §21.190 of this chapter, provided that— (1) The aircraft is a powered parachute or a weight-shift-control aircraft; (2) The person has at least 100 hours of pilot-in-command time in the category and class of aircraft flown; and (3) The person is familiar with the processes and procedures applicable to the conduct of production flight testing, to include operations conducted under a special flight permit and any associated operating limitations”. ETAK is seeking exemption from this regulation, because ETAK believes that there is inconclusive evidence that a person with a private pilot certificate can successfully maneuver a sUAS without first hand flight experience with the particular sUAS. Therefore, we believe our own flight training with the sUAS will be more than satisfactory.

ETAK seeks exemption from 14 C.F.R. 91.103, which discusses pre-flight actions. Specifically, section 91.103 states, “Each pilot in command shall, before beginning a flight, become familiar with all available information concerning that flight. This information must include: (a) For a flight under IFR or a flight not in the vicinity of an airport, weather reports and forecasts, fuel requirements, alternatives available if the planned flight cannot be completed, and any known traffic delays of which the pilot in command has been advised by ATC; (b) For any flight, runway lengths at airports of intended use, and the following takeoff and landing distance information: (1) For civil aircraft for which an approved Airplane or Rotorcraft Flight Manual containing takeoff and landing distance data is required, the takeoff and landing distance data contained therein; and (2) For civil aircraft other than those specified in paragraph (b)(1) of this section, other reliable information appropriate to the aircraft, relating to aircraft performance under expected values of airport elevation and runway slope, aircraft gross weight, and wind and temperature”. An exemption is requested from section 91.103, as FAA approved rotorcraft flight manuals will not be used. In the absence of the flight manuals the PIC will take all pre-flight

actions, including reviewing weather, flight battery requirements, landing and takeoff distances, and aircraft performance data before starting a flight.

ETAK seeks exemption from 14 C.F.R. 91.105, which discusses flight crewmembers at stations. Specifically, 91.105 states “(a) During takeoff and landing, and while en route, each required flight crewmember shall (1) Be at the crewmember station unless the absence is necessary to perform duties in connection with the operation of the aircraft or in connection with physiological needs; and (2) Keep the safety belt fastened while at the crewmember station. (b) Each required flight crewmember of a U.S.-registered civil aircraft shall, during takeoff and landing, keep his or her shoulder harness fastened while at his or her assigned duty station. This paragraph does not apply if (1) The seat at the crewmember's station is not equipped with a shoulder harness; or (2) The crewmember would be unable to perform required duties with the shoulder harness fastened. ETAK will need exemption from this regulation due to the fact that the sUAS will not have a flight crew or crew stations other than the PIC. The PIC will also not have to be restrained into a seat via shoulder harness or safety belt at the time of the flight.

ETAK seeks exemption from 14 C.F.R. 91.109, which discusses flight instruction, simulated instrument flight, and certain flight tests. Specifically, 91.109 states “(a) No person may operate a civil aircraft (except a manned free balloon) that is being used for flight instruction unless that aircraft has fully functioning dual controls. However, instrument flight instruction may be given in an airplane that is equipped with a single, functioning throw over control wheel that controls the elevator and ailerons, in place of fixed, dual controls, when (1) The instructor has determined that the flight can be conducted safely; and (2) The person manipulating the controls has at least a private pilot certificate with appropriate category and class ratings. (b) An airplane equipped with a single, functioning throw over control wheel that controls the elevator and ailerons, in place of fixed, dual controls may be used for flight instruction to conduct a flight review required by §61.56 of this chapter, or to obtain recent flight experience or an instrument proficiency check required by §61.57 when (1) The airplane is equipped with operable rudder pedals at both pilot stations; (2) The pilot manipulating the controls is qualified to serve and serves as pilot in command during the entire flight; (3) The instructor is current and qualified to serve as pilot in command of the airplane, meets the requirements of §61.195(b), and has logged at least 25 hours of pilot-in-command flight time in the make and model of airplane; and (4) The pilot in command and the instructor have determined the flight can be conducted safely. (c) No person may operate a civil aircraft in simulated instrument flight unless (1) The other control seat is occupied by a safety pilot who possesses at least a private pilot certificate with category and class ratings appropriate to the aircraft being flown. (2) The safety pilot has adequate vision forward and to each side of the aircraft, or a competent observer in the aircraft adequately supplements the vision of the safety pilot; and (3) Except in the case of lighter-than-air aircraft, that aircraft is equipped with fully functioning dual controls. However, simulated instrument flight may be conducted in a single-engine airplane, equipped with a single, functioning, throw over control wheel, in place of fixed, dual controls of the elevator and ailerons, when (i) The safety pilot has determined that the flight can be conducted safely; and (ii) The person manipulating the controls has at least a private pilot certificate with appropriate category and class ratings. (d) No person may operate a civil aircraft that is being used for a flight test for an airline

transport pilot certificate or a class or type rating on that certificate, or for a part 121 proficiency flight test, unless the pilot seated at the controls, other than the pilot being checked, is fully qualified to act as pilot in command of the aircraft”. Again, ETAK believes that there is inconclusive evidence that a person with a private pilot certificate or license can successfully maneuver or train someone to use an sUAS without first hand flight experience with the particular sUAS. Therefore, we believe our own flight training and first hand experiences with the sUAS will be satisfactory. Also, the sUAS will be operated by a remote control, which will only require a one person operator and dual controls will not be necessary.

ETAK seeks exemption from 14 C.F.R. 91.119, which discusses minimum safe altitudes. Specifically, 14 C.F.R. 91.119 states “Except when necessary for takeoff or landing, no person may operate an aircraft below the following altitudes: (a) *Anywhere*. An altitude allowing, if a power unit fails, an emergency landing without undue hazard to persons or property on the surface. (b) *Over congested areas*. Over any congested area of a city, town, or settlement, or over any open air assembly of persons, an altitude of 1,000 feet above the highest obstacle within a horizontal radius of 2,000 feet of the aircraft. (c) *Over other than congested areas*. An altitude of 500 feet above the surface, except over open water or sparsely populated areas. In those cases, the aircraft may not be operated closer than 500 feet to any person, vessel, vehicle, or structure. (d) *Helicopters, powered parachutes, and weight-shift-control aircraft*. If the operation is conducted without hazard to persons or property on the surface— (1) A helicopter may be operated at less than the minimums prescribed in paragraph (b) or (c) of this section, provided each person operating the helicopter complies with any routes or altitudes specifically prescribed for helicopters by the FAA; and (2) A powered parachute or weight-shift-control aircraft may be operated at less than the minimums prescribed in paragraph (c) of this section”. ETAK seeks exemption from this regulation due to the fact that cell towers are less than 500ft and we will be flying in close proximities of the towers to gather our information.

ETAK seeks exemption from 14 C.F.R. 91.121, which discusses altimeter settings. Specifically, 14 C.F.R. 91.121 states, (a) Each person operating an aircraft shall maintain the cruising altitude or flight level of that aircraft, as the case may be, by reference to an altimeter that is set, when operating—(1) Below 18,000 feet MSL, to—(i) The current reported altimeter setting of a station along the route and within 100 nautical miles of the aircraft; (ii) If there is no station within the area prescribed in paragraph (a)(1)(i) of this section, the current reported altimeter setting of an appropriate available station; or (iii) In the case of an aircraft not equipped with a radio, the elevation of the departure airport or an appropriate altimeter setting available before departure; or (2) At or above 18,000 feet MSL, to 29.92” Hg. (b) The lowest usable flight level is determined by the atmospheric pressure in the area of operation as shown in the following table:

Current altimeter setting	Lowest usable flight level
29.92 (or higher)	180

29.91 through 29.42	185
29.41 through 28.92	190
28.91 through 28.42	195
28.41 through 27.92	200
27.91 through 27.42	205
27.41 through 26.92	210

(c) To convert minimum altitude prescribed under §§91.119 and 91.177 to the minimum flight level, the pilot shall take the flight level equivalent of the minimum altitude in feet and add the appropriate number of feet specified below, according to the current reported altimeter setting:”

<b>Current altimeter setting</b>	<b>Adjustment factor</b>
29.92 (or higher)	None
29.91 through 29.42	500
29.41 through 28.92	1,000
28.91 through 28.42	1,500
28.41 through 27.92	2,000
27.91 through 27.42	2,500
27.41 through 26.92	3,000

As our sUAS does not have a barometric altimeter, but instead outputs GPS altitude data, an exemption is needed. An equivalent level of safety will be achieved by the PIC confirming the altitude of the launch site shown on the GPS altitude indicator before and during the flight.

ETAK seeks exemption from 14 C.F.R. 91.151, which discusses fuel requirements for flight in VFR conditions. Specifically, 91.151 states “(a) No person may begin a flight in an airplane under VFR conditions unless (considering wind and forecast weather conditions) there is enough fuel to fly to the first point of intended landing and, assuming normal cruising speed— (1) During the day, to fly after that

for at least 30 minutes; or (2) At night, to fly after that for at least 45 minutes. (b) No person may begin a flight in a rotorcraft under VFR conditions unless (considering wind and forecast weather conditions) there is enough fuel to fly to the first point of intended landing and, assuming normal cruising speed, to fly after that for at least 20 minutes". ETAK's sUAS has a maximum flight time of 25 minutes which is less than the 30 minute reserve minimum. This reserve minimum would not even allow ETAK's sUAS a chance to fly. In ETAK's aircraft flight manual, the PIC is instructed to maintain flight until battery power reaches 25%. ETAK believes the restraint issued in our aircraft flight manual achieves a satisfactory safety standard to go by. This restriction would also be more than adequate to return the sUAS to its home point or pre-determined landing-zone from anywhere in its already limited operating area. ETAK's sUAS will not be flown during night or late evening hours.

ETAK seeks exemption from 14 C.F.R. 91.203, which discusses civil aircraft required certifications. Specifically, 91.203 states "(a) Except as provided in §91.715, no person may operate a civil aircraft unless it has within it the following: (1) An appropriate and current airworthiness certificate. Each U.S. airworthiness certificate used to comply with this subparagraph (except a special flight permit, a copy of the applicable operations specifications issued under §21.197(c) of this chapter, appropriate sections of the air carrier manual required by parts 121 and 135 of this chapter containing that portion of the operations specifications issued under §21.197(c), or an authorization under §91.611) must have on it the registration number assigned to the aircraft under part 47 of this chapter. However, the airworthiness certificate need not have on it an assigned special identification number before 10 days after that number is first affixed to the aircraft. A revised airworthiness certificate having on it an assigned special identification number, that has been affixed to an aircraft, may only be obtained upon application to an FAA Flight Standards district office. (2) An effective U.S. registration certificate issued to its owner or, for operation within the United States, the second copy of the Aircraft registration Application as provided for in §47.31(c), or a registration certification issued under the laws of a foreign country. (b) No person may operate a civil aircraft unless the airworthiness certificate required by paragraph (a) of this section or a special flight authorization issued under §91.715 is displayed at the cabin or cockpit entrance so that it is legible to passengers or crew. (c) No person may operate an aircraft with a fuel tank installed within the passenger compartment or a baggage compartment unless the installation was accomplished pursuant to part 43 of this chapter, and a copy of FAA Form 337 authorizing that installation is on board the aircraft. (d) No person may operate a civil airplane (domestic or foreign) into or out of an airport in the United States unless it complies with the fuel venting and exhaust emissions requirements of part 34 of this chapter". ETAK believes that an appropriate and current airworthiness certificate would not be necessary to fly a sUAS given the size of the aircraft and the necessary level of skill needed to operate the aircraft. ETAK seeks exemption from this regulation because we believe this rule was not meant for a sUAS and operators.

ETAK seeks exemption from 14 C.F.R. 91.405, 91.407, 91.409, and 91.417, which discusses required aircraft maintenance, operation after maintenance, preventive maintenance, rebuilding, or alteration, inspections, and maintenance records. In ETAK's aircraft flight manual, maintenance and inspection procedures have been established for the aircraft. ETAK believes these regulations are meant for manned operated aircrafts and not unmanned systems, therefore making them unnecessary.



Nevertheless, we seek an exemption from any such specific provisions to the extent FAA finds it necessary to grant this request.

***(d) The reasons why granting ETAK's request would be in the public interest; that is, how it would benefit the public as a whole***

ETAK is classified as a utility by the U.S. Department of Transportation and provides services to the wireless industry. Wireless services have become a major backbone for nationwide 911 emergency response and ETAK's use of a sUAS can assist in verifying that the components that make up that backbone are fully functional and in proper repair. ETAK's sUAS usage in the wireless industry, we will be able to gather valuable information to help increase safety and productivity. In addition, the sUAS flights will minimize the need for technicians to climb towers, putting fewer lives in danger. Ultimately, tower climbers will still be needed to install tower equipment, but a sUAS will decrease the amount of times a climber will be needed.

***(e) The reasons why granting the exemption would not adversely affect safety, or how the exemption would provide a level of safety at least equal to that provided by the rule from which ETAK seeks exemption***

Our Engineering department will provide a level of safety that exceeds the level of safety required by the FAA for its use on sUAS. The following are ETAK's safety procedures, features, regulations, and operating specifications for our sUAS:

- The Pilot In Command (PIC) and potential observers will be required to wear hard hats, safety vests, and safety glasses to protect the head and eyes from potential mishaps during given operational flights including training or testing of sUAS.
- The flight area of the sUAS will be observed for best take off and landing locations. Desired conditions include: flat and level surfaces clear of debris, at least 15ft from power lines and structures, and a minimum distance of 12ft from the PIC and observers.
- The sUAS will also be in the Visual Line of Sight (VLOS) to both the PIC and potential observers during all flights.
- Flights must take place during good weather conditions with no rain, low laying clouds, or heavy winds. All flights will take place during daylight hours with no evening or late night flights.
- The PIC(s) of the sUAS will at least have 7 training hours or 15 flights accrued before being designated working flights around cellular communication towers.
- The sUAS will have safety bumpers, sold by the manufacturer, installed around the propellers to protect the propellers, structures and persons from damage and injury.
- All batteries must be charged completely before each flight and each flight must end when the battery has a 25% power level remaining.
- A visual safety inspection will occur before each flight testing propeller tightness, lens cap removals, bumper guards installed properly, mobile device positioned correctly onto remote, and proper safety equipment is adorned to PIC and observers.
- The sUAS will be flown under a height of 500 ft AGL and in less than a 10,000 square feet area.

- No operator or potential observer will engage in, nor may an operator or potential observer permit, any activity during a critical phase of flight so as to ensure that the sUAS is in a condition for safe flight operation and in a configuration appropriate for the purpose of the intended flight.
- If there is more than just an operator at a site during a flight, the operator and observer(s) will maintain two-way communication with each other during all operations; if unable to maintain two-way communications, or if any condition occurs that may otherwise cause the operation to be unsafe, the operator will immediately conclude the operation.
- If the communication link is lost, the sUAS will go into fail-safe mode and safely descend to its designated home-point location. If the communication link is reconnected during fail-safe mode, control of the sUAS can be regained before landing occurs at the home-point location.
- There is no fuel or payload to the sUAS, therefore there will be no potential explosives or risk of explosion if a crash occurs with the sUAS.
- The sUAS will feature a built in compass that will be recalibrated at every site to maintain accurate directional readings. The compass will also help in keeping the sUAS stable during flights.
- The sUAS will record GPS location data once Ready to Fly status has been obtained. A minimum of 6 satellites will activate the Ready to Fly status.
- The weight of the sUAS is less than 10 lbs. with a maximum ascent speed of 6 m/s and a descent speed of 2 m/s. The aircrafts maximum flight speed is 15 m/s.
- The aircrafts vertical and horizontal aspect concerning hovering accuracy is 0.8m and 2.5m respectfully.
- The aircrafts maximum yaw angular velocity is 200°/second with a maximum tilt angle of 35°.
- The aircraft wheelbase is 350mm in length.
- The tilting range of the aircrafts gimbal is between 0° and 60°.
- The CE and FCC compliance communication distances in an open area for the remote controller is 300m and 500m respectfully. The remote has an operating frequency of 5.728 GHz and 5.85 GHz.
- The CE and FCC compliance transmitting power (EIRP) of the remote controller is 25mW and 125mW respectfully. The remotes working current and voltage is 80mA at 6V and runs off 4 AA batteries.
- The remote range extender has an operating frequency between 2412 MHz and 2462 MHz. The open area communication distance of the range extender is 300m with a transmitting power of 17dBm.
- The aircraft runs off a 5200mAh Li-Po battery.
- The mounted camera has a resolution of 14 megapixels and a Field Of View (FOV) of 120°/110°/85°. The sensor size of the camera is a 1/2.3" and supports HD video recording as well as RAW and JPEG photo formats.
- The phone application will work on Apple iOS 6.0 or above and Android system 4.0 and above. Tablets running these operating systems will also be supported, but not recommended. The phone application will operate as the First Person Viewer (FPV) for the aircraft.

***(f) A summary FAA can publish in the FEDERAL REGISTER, stating: (1) The rule from which you seek the exemption; and (2) A brief description of the nature of the exemption you seek***

*Petitioner:* ETAK Systems, Inc.

*Sections of 14 C.F.R. Affected:* 21 Subpart H; 45.23(b); 61.113(a)(b); 91.103; 91.105; 91.109; 91.119(c); 91.121(a)(1)(iii); 91.151(a)(1); 91.203; 91.405; 91.407; 91.409; and 91.417

*Description of Relief Sought:* Petitioner seeks relief from the requirements of 14 C.F.R. 21 Subpart H; 45.23(b); 61.113(a)(b); 91.103; 91.105; 91.109; 91.119(c); 91.121(a)(1)(iii); 91.151(a)(1); 91.203; 91.405; 91.407; 91.409; and 91.417 to conduct cellular tower and compound surveys for wireless providers on their properties and subject to operating procedures that meet or exceed those that FAA requires.

***(g) Any additional information, views or arguments available to support your request***

Please see the introduction to this exemption request.

***(h) If you want to exercise the privileges of your exemption outside of the United States, the reason why you need to do so***

The Operations described in this exemption request will be conducted wholly within the United States.

Please do not hesitate to contact me via email at [cterry@etaksystems.com](mailto:cterry@etaksystems.com) if you have any questions or concerns.

Respectfully submitted,

Charlie Terry  
Engineering Manager  
ETAK Systems, Inc.