

October 5, 2014

United States Department of Transportation
Docket Management System
1200 New Jersey Ave., SE
West Building Ground Floor Room W12-140
Washington, DC 20590

DEPARTMENT OF
TRANSPORTATION
OFFICE OF
LEGISLATIVE
AFFAIRS
2014 OCT 14 P 1:51

Re: Exemption Request Pursuant To Section 333 of the FAA Reform Act of 2012

To whom this matter applies:

Greetings. We are contacting you as it relates to the FAA Modernization and Reform Act of 2012 (the "ReformAct") and the positions and/or procedures contained in 14 C.F.R. 11, to request that Somniaire, LLC, which has filed an application with the PA Department of State for doing business (DBA) as SkyePro Aerial Video Productions, be exempted from the Federal Aviation Regulations listed within the body of this letter so that SkyePro Video may operate small, low altitude (multi-rotor) unmanned aircraft systems ("UAS") commercially in airspace regulated by the Federal Aviation Administration.

Our intent is to manage all such operations within and under the conditions outlined or as established by the FAA as required by Section 333. The conditions identified and proposed by the applicant are drawn from Order 8900.1 CHG 0, Volume 3, Chapter 8: Issue a Certificate of Waiver for Motion Picture and Television Filming, and which also includes video production for other commercial use and purposes.

Ridgely Francisco, founder and President of Somniaire, LLC (PA) has over 35 years of marketing and Art Direction experience as it relates to consumer and business-to-business advertising and marketing. It is simply our intent and hope to include low altitude video production with our other design and present video/film production services. Ridgely Francisco is also a member of the Academy of Model Aeronautics (AMA) and is well versed in the safe and responsible care and operation of multi-rotor as well as fixed wing model unmanned aircrafts.

Our request would permit SkyePro Video Productions to operate small, lightweight, unmanned remote controlled (RC) UASs in strictly controlled and limited airspace. As safety is a priority when addressing this matter, our own guidelines demand that any and all unmanned crafts are to be ALWAYS in line of sight and ALWAYS with strict 300 ft. ceiling limit. We utilize teams of pilot and spotters in an effort to ensure safe control over the flight lines of our unmanned aircrafts. We make it a PRIORITY to maintain complete awareness of surroundings, including people, crowds, structures, wildlife and property, private, public or government owned.

Our use of unmanned RC aircraft pilots requires they adhere to these safety outlines at all times. All flights are based on pre-production meetings which delineate and clarify all flight maneuvers prior to actual flight. Equipment is checked prior to flights to ensure a high level of safety as well.

Granting SkyePro's request for exemption helps to realize and integrate UASs into the national airspace. And we agree with the FAA that any and all uses of UASs on a commercial level should be carefully considered and ultimately permitted, yet controlled for the sake of safety to all involved, either by choice or by chance.

Somniaire, LLC (DBA) SkyePro Video Productions respectfully requests the grant of an exemption allowing it to operate lightweight, multi-rotor remote controlled UAS's for commercial uses. At present, we do not perform any flights for commercial purposes yet wish to with the FAA's permission. Our website maintains examples of aerial videos produced as artistic portfolio presentation only. We state that only non-commercial uses of any and all aerial videography are considered.

We are requesting exemptions on all Specific Sections of Title 14 (as they relate to the commercial use of unmanned aircraft systems (UASs)) of the Code of Federal Regulations. SkyePro Video submits this application in accordance with the Reform Act, 112 P.L. 95 §§ 331-334, seeking relief from any applicable FARs operating to prevent SkyePro Video contemplated commercial use within the national airspace system.

The Reform Act in Section 332 provides for such integration of civil unmanned aircraft systems into our national airspace system as it is in the public's interest to do so. SkyePro's lightweight UASs meet the definition of "small unmanned aircraft" as defined in Section 331. Therefore SkyePro Video is requesting permission to operate its lightweight UASs prior to the time period by which the Reform Act requires the FAA to promulgate rules governing such craft.

The Reform Act guides the Secretary in determining the types of UASs that may operate safely in our national airspace system. Considerations include:
The weight, size, speed and overall capabilities of the UAS; Whether the UAS will be operated near airports or populated areas; and, Whether the UAS will be operated by line of sight. 112 P.L. 95 § 333 (a).

Each of these criteria help to rule in favor of an exemption for SkyePro Video.

We operate only small quad-rotor and 8 rotor crafts that measure no more than 42" in diameter. Weight is limited to under 20 pounds, which includes the UAs and attached camera equipment. Speed is limited to no more than 40 mph however there is little need for this type of speed since we specialize in primarily slow hovering modes of operation. Other rules adhered to presently by SkyePro Video include:

- We never fly over people, or crowds of people or animals, either in the wild or domestic environments. We always hover off to one side of our intended subject.
- We only operate by In Line Sight. We never allow any UAS to disappear from the operator or spotter's view.
- All SkyePro Video unmanned crafts utilize only Lithium Polymer (LiPo) batteries.

There is never any combustible fuel used to operate our unmanned crafts.

- We always use a spotter to manage and maintain visual contact with the UAS.
- Typical battery life is 12-14 minutes. We use electronic monitoring to gauge battery life and will land our unmanned aircrafts when battery life approaches 20%.
- Our Phantom brand UAS has built in GPS technology in the rare chance of a loss of communication. Should transmitter connections fail, the UAS will automatically return to the operator's location, flying at a height of approx. 60 feet and land safely.
- We operate at altitudes of no more than 300 feet. Most operation is below 100 feet.
- We will not fly within 5 miles of any public or private airport, airstrip, US military property, NASA property or any government property that engage in aeronautics or testing of military systems of any sort or properties which post restricted access warnings.
- Should we receive an exemption as hoped, we would only fly a UAS after we and any client has predetermined safety and other related logistics to ensure safe use. We realize this is for the protection of people, animals, natural habitats and any nearby property.
- SkyePro would also obtain all necessary permits and/or permissions prior to any flights. We always respect the "space and privacy" of citizens and business properties.

Summary- The FAA May Publish in the Federal Register:

After review of sections 14 C.F.R. 21 and 14 C.F.R. 91: Airworthiness Certificates, Manuals and The Like, we realize that as operators of very small, unmanned aircrafts, these regulations do not apply to the operation of UAS aircrafts.

These Regulations only apply to aircraft with an airworthiness certificate. They will not therefore, apply to SkyePro Video should our request for exemption be granted.

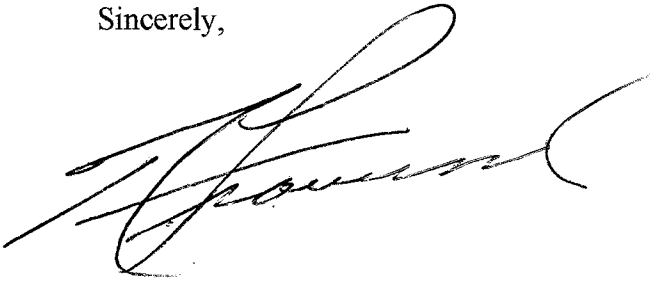
IN CONCLUSION

SOMNIAIRE, LLC, D/B/A SKYEPRO VIDEO requests an exemption from the following Regulations: 14 C.F.R.21, subpart H; 14 C.P.R. 45.23(b); 14 C.F.R. §§ 61.113 (a) & (b); 14 C.F.R. § 91.7 (a); 14 C.F.R. § 91.9 (b)(2); 14 C.F.R. § 91.103(b); 14 C.F.R. § 91.109; 14 C.F.R. § 91.119; 14 C.F.R. § 91.121; 14 C.F.R. § 91.151(a); 14 C.F.R. §§ 91.203(a) and (b); 14 C.F.R. § 91.405 (a); 14 C.F.R. § 91.407 (a)(1); 14 C.P.R. § 91.409 (a)(2); 14 C.P.R. § 91.409 (a)(2); and, 14 C.P.R. §§ 91.417 (a) & (b) to commercially operate its small unmanned, lightweight aircraft vehicles for the benefit of producing aerial video footage which could be used in motion pictures, corporate or television productions, to produce, edit and utilize aerial footage from our UAS aircrafts for marketing purposes for both business to business as well as business to consumer uses. We also contemplate other uses such as instructional uses, working with local and regional government or law enforcement agencies and/or using footage for training or surveying purposes.

Our message and belief in the use of UAS aircrafts is: "Safety first. Awesome footage second." We agree with the FAA that there needs to be strict guidelines and protocols in place when it comes to the safe commercial use of unmanned aircrafts. The news is full of irresponsible people using unmanned crafts with little regard for safety. Therefore, we applaud your ongoing quest to keeping the skies safe.

Thank you in advance for your considerations regarding this matter. We hope you will grant our request for exemption from the above listed regulations. We await your timely reply.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Francisco', with a large, stylized initial 'R' and a long, sweeping horizontal stroke.

Ridgely B. Francisco, Founder/CEO
Somniaire, LLC.
13 Lizbeth Lane
Berwyn, PA 19312