

AirCam Photography  
Tippon Chandler Weiss  
798 Lighthouse Ave. #232  
Monterey, Ca 93940  
[tip@aircamphotography.com](mailto:tip@aircamphotography.com)  
831-901-9396

FAA  
Docket Management Facility  
U.S. Department of Transportation  
1200 New Jersey Avenue, SE  
West Building, Ground Floor, Room W12-140  
Washington, DC 20590

Dear Exemption Manager,

I am submitting my petition for Unmanned Aircraft System operations for your consideration. I am an experienced UAS operator with over 500 flight hours and an FAA licensed Commercial Instrument Multi Engine Airplane Pilot with a second class medical and over 1450 airplane flight hours.

I am currently working towards my Airline Transport Pilot airplane rating having taken ground school courses and passing my written test July 12<sup>th</sup> 2014. I am a member of the FAA wings safety program and enjoy keeping myself immersed in aviation and my skills current. I also belong to the Monterey Navy Flying club where I attend monthly safety meetings often hosted by an FAA official. In addition, I have been a member of the Civil Air Patrol since 1990 and have assisted in search and rescue missions. I take the skills and education for safe operation of UAS very seriously.

I request a waiver of the sections identified below in an effort to operate a UAS in commercial applications such as professional marketing, produce field management, inspections, real estate, construction, events, etc.

This request specifically serves the public and economic interest to aide in the areas stated above. In addition, I would gladly offer my services upon request and with proper coordination and appropriateness to any official search and rescue or emergency services organization.

The granting of this exemption would make logical sense because of my professional approach to UAS operations, my clear understanding of FAA rules, my awareness of operational and restricted airspace, my experience as a pilot, my ongoing FAA approved educational activities, and my attitude of safety first when it comes to flight operations.

I believe with the granting of this exemption and the additional operational experience I will gain from flight operations will greatly benefit the future of UAS operations. I hope to become a future Airplane and UAS instructor to inspire future generations of pilots and contribute what I have learned in this process.

I believe there is much work to be done in developing the best use of UAS in the public. The coursework and training for best use of the UAS, best operation utilization, best role for the UAS pilot, etc. has yet to be developed in the general public arena. I would like to play a role in that development but I need

more operational flight experience with the public to do that. This exemption should allow me to get that real world experience.

**I am currently seeking exemption of:**

Section of 14CFR: parts 21 Subpart H, 27, 45.23(b), 45.27(a), 61.113(a) and (b), 61.133(a), 91.7(a), 61.133(a), 91.7(a), 91.9(b)(2), 91.103, 91.109(a), 91.119, 91.121, 91.151(a), 91.203(a) and (b), 91.319(a) (1), 91.405(a), 91.407(a)(1), 91.409(a)(2), 91.417(a) and (b)

If I have erroneously omitted any other relevant section for my intended operations, please feel free to suggest the missing section(s).

**Suggested Public Federal Register Summary:**

“The petitioner is seeking an exemption to operate unmanned aircraft systems (UAS) typically weighing between 3 and 7 pounds to services for businesses including professional marketing, produce field management, inspections, real estate, construction, events, etc. Data gathered may include still and moving images captured with onboard cameras.”

**UAS Description:**

I am asking for an exemption for a UAS weighing less than 25 pounds because I forecast I may be testing and evaluating UAS for the public safety role. These tests would occur in a controlled environment and a flight safe range. The initial crafts I would fly operationally are small multi rotors which weigh between 3 and 7 pounds and would be better qualified as a sUAS (small Unmanned Aerial System).

In the event a loss of communication occurs the craft will rise up vertically to a safe height before beginning an automatic return to home function. The control signal may be reconnected in flight and the pilot can take over safe operations again if communication is reestablished. However in case of a GPS failure the craft will be able to be manually flown to a safe landing by the pilot.

The craft operates electrically, carries no flammable fuel, has an integrated GPS pilot system, provides location information along with height AGL, speed, battery life, has programmed no-fly zones for controlled airports, and provides direction of travel and distance from the pilot.

**Flight operations:**

I am well aware of conducting safe flight operations and planning flight paths that minimize any overflight of crowds.

Any flight operations in town environments would typically be for close air operations for focused subjects such as professional marketing, produce field management, inspections, real estate, construction, and events. These operations occur in a very limited area and would not need to overfly densely populated areas in general. Operations would be more vertical in nature above or alongside the specific subject.

My proposed UAS operations are conducted at low altitudes less than 400 feet AGL (within Class G airspace), typically below 200 feet AGL, not over crowds, and not near airports. If I need to fly higher

than 400 feet, I utilize full sized manned helicopters or airplanes to achieve my objective. If I feel a situation is high risk due to close proximity to people or property, I simply would not fly the UAS and utilize other tools such as my 50 foot telescoping push up mast for image acquisition. Flights will end when battery reserve reaches 25 percent. Operations will not occur under IFR conditions.

In addition, preflight and post-flight checklists and UAS examinations will help detect any abnormalities prior to flight and after flight. Any UAS unable to satisfy safety checklists will be removed from service until the issue can be resolved. Granting this request would not adversely affect safety since operations would be in accordance with current UAS rules.

### **Section 333 Compliance and Appropriateness:**

Based on the size of the craft, experience of the pilot, and operational goals, this request appears to be well suited for approval using the criteria outlined in Section 333 of the FAA Modernization and Reform Act of 2012 and will move safe flight operations forward in accordance with the intent of Section 333.

### **Ongoing Efforts:**

I am also keenly aware of the new issues involved in UAS public safety operations and would greatly like to assist the public and businesses to fly with commonsense and safety first in mind.

Many UAS operators I've seen are under the misperception small UAS craft are toys, which they are not. I intend on pursuing an Airplane Flight Instructors Certificate and if there is a UAS Flight Instructors Certificate available in the future, I will pursue that as well. With your help I hope to obtain this exemption in order to use my exempted flight experience to help UAS operators operate safely while they utilize the UAS for positive purposes.

Sincerely,

Tippon Chandler Weiss  
AirCam Photography