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U. S. Department of Transportation
Docket Management System
1200 New Jersey Ave.,
SE Washington, DC 20590

Subject: Exemption Request Section 333 of the FAA Reform Act and Part 11 of the Federal Aviation Regulations from 14 C.F.R. Part 21, 45.27(a), 45.29 (3) (c)(d)(e)(f)(g)(h), 61.113 (a) & (b), 91.103, 91.119, 91.121, 91.203, 91.151

Following the format of FAA Exemption No. 11138 -Regulatory Docket No. FAA – 2014 – 0481 I have included:

- 1) Supplemental Response for Petition
- 2) PHANTOM Flying F low Chart V1.0 (Simplified Version),
PHANTOM Quick Start Manual v1.7, PHANTOM Advanced Manual v.1.4
- 3) PHANTOM 2 Vision+ User Manual
- 4) Personal protocols and controls - Safety/Flight concerns

Pursuant to Section 333 of the FAA Modernization and Reform Act of 2012 and 14 C.F.R. Part 11, I, Bob Sokoler, a licensed Realtor for 10 years, preparing this exemption request myself, would like to apply for an exemption from the following Code of Federal Regulations (C.F.R) to be allowed commercial operation of lightweight Unmanned Aircraft Systems (sUAS) for aerial imaging and video of Louisville Landmarks and homes I list for sale.

I have experience in flying hobby quads for recreational purposes during the past 3 years without incident. I have added a hobby grade DJI Phantom 2 quad-copter (maximum gross weight 3 pounds, equipped with four rotors that are driven by electric motors powered by batteries, the UAS has a maximum airspeed of 30 knots) to my inventory equipped with a GoPro 4 Black camera with intent for aerial videography/cinematography to enhance academic community awareness and augment real estate listing videos; following an exemption and approval by the FAA.

My exemption request would permit operation of ultra-light weight, unmanned (piloted by remote control) in predetermined areas away from general public, airports, heliports and vehicular traffic, under 300 ft. and after carefully reviewing, inspecting and

examining the area of aerial observation. This would allow for community videos and within property boundaries for individual homeowner real estate listing videos/photos. I will abide all FAA requirements to ensure this exemption will provide a level of safety at least equal to existing rules and will only operate in a safe environment that is strictly controlled, are away from power lines, elevated lights, airports and actively populated areas; and I will conduct extensive preflight inspections and protocols, during which safety carries primary importance.

14 C.F.R. Part 21, Subpart H: Airworthiness Certificates 14 CFR § 91.203

Given the size, weight, speed, and limited operating area associated with the aircraft to be utilized, I am asking exemption from 14CFRpart21,Subpart H(Airworthiness Certificates)and§91.203 (a) and (b) (Certifications required),subject to certain conditions and limitations, is warranted and meets the requirements for an equivalent level of safety under14CFRpart 11 and Section 333 of P.L. 112-95 (Section 333).

14 C.F.R. 45.27(a): Location of marks; non fixed-wing aircraft. 14 C.F.R. 45.29 (3) (c)(d)(e)(f)(h): Size of Marks

Furthermore I request an exemption from §45.23 Marking of the aircraft because my UAS will not have a cabin, cockpit or pilot station on which to mark certain words or phrases. Additionally two -inch lettering is difficult to place on such a small aircraft with dimensions smaller than the minimal lettering requirement. I understand the need for markings and will mark my UAS in the largest possible lettering by placing the word “Experimental” or assigned number or name (based on a request or ruling by the FAA) on its fuselage as required by §45.29(f) so that anyone assisting him as a spotter will see the markings.

I also ask for an exemption from §§91.405(a),91.407(a)(1), 91.409(a)(2) and 91.417(a) and(b) Maintenance inspections may be required and should be granted since they only apply to aircraft with an airworthiness certificate. But, as a safety precaution I will perform a preflight inspection of my UAS before each flight as outlined in his operating documents.

14 CFR 61.113 (a) & (b): Private pilot privileges and limitations: Pilot in command.

Under §61.113 (a) and(b) private pilots are limited to non-commercial operations, however I can achieve an equivalent level of safety as achieved by current regulations because my UAS does not carry any pilots or passengers. While helpful, a pilots’ license will not ensure remote control piloting skills. The risks of operating a UAS are far less than the risk levels inherent in the commercial activities outlined in 14 CFR part61,et seq., I requests an exemption from §61.113 Private Pilot Privileges and Limitations. A side note, I have already explored getting my pilot’s license, at the direction of the FAA, I would gladly begin education and eventual licensing.

Regarding UAS operational training, as stated previously I have three years' experience flying numerous practice flights in remote areas as a hobbyist simulating flights for future commercial use to gain familiarization with the characteristics of his UAS' performance under different temperature and weather conditions. I also own and practices on a computerized simulated flights software to maintain adequate skills and response reflex time. I'm also aware of a three-day drone training course in Las Vegas Nevada and would gladly attend if required by the FAA.

14 C.F.R. 91.103 (b)(1), (b)(2): Preflight Action

If granted an exemption I agree to additional safety procedures including, but not limited to:

- 1) Keeping my USA within a radius distance of 1000 feet from the controller to both aid in direct line of sight visual observation.
- 2) Operate the UAS for 3-7 minutes per flight; land my UAS according to the manufacturer's recommended minimum level of battery power.
- 3) Operate my UAS only within visual line of sight (VLOS).
- 4) Use the UAS' global positioning system(GPS) flight safety feature; it hovers and then slowly lands if communication with the remote control.
- 5) Conduct all operations under my own personal and flight safety protocols (including posting a warning sign reading: "Attention Aerial Photography in Progress –Remain Back 150 feet").
- 6) I will operate and will actively analyze flight data and other sources of information to constantly update and enhance my safety protocols.
- 7) Contact respective airports if operations will be within 5 miles to advise them of his estimated flight time, flight duration, elevation of flight and other pertinent information.
- 8) Always obtain all necessary permissions prior to operation.
- 9) Have procedures in place to abort flights in the event of safety breaches or potential danger.

Aerial videography for geographical awareness of real estate marketing has been around for a long time through manned fixed winged aircraft and helicopters, but for small business owners, its expense has been cost-prohibitive. Granting this exemption would allow me to provide this service at a much lower cost. Further, my small UAS, when used properly, will pose no threat to the public given its small size and lack of combustible fuel when compared to larger manned aircraft. The operation of his UAS will minimize ecological damage and promote economic growth by providing information to companies looking to relocate or build in the Louisville Kentucky area.

One final comment, the use of a UAS has already proven to increase the marketability of a home. For example please review the article published January 7, 2015 in the San Diego source entitled "[drone use in real estate may increase](#)", (also added as an attachment). The article cites the FAA's exemption given to Douglas Trudeau, but also describes a record high price for an area home that used a drone for aerial photography. "When broker Kurt Wannebo added an aerial video to the listing for a

Carmel Valley house, located on a large corner lot overlooking canyons on two sides, he saw Web traffic noticeably increase.”

I understand this may be outside the scope of this request but as a real estate agent I think it's important to point out that the use of any tool that increases value to a home or community (by adding visibility to more potential buyers) is in the best interest of homeowners nationwide. Selling a home faster and for more money because of the use of new technology (being safely used and approved by the FAA) will go a long way to ensure our economy continues to grow.