

Petition for Exemption 14 CFR § 11.81

(a) Sponsor: David Draper  
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(b) Section 333 of the *FAA Modernization and Reform Act of 2012*. In addition, respectfully request the FAA grant exemptions from regulations that address general flight rules, pilot certificate requirements, manuals, maintenance and equipment mandates.

(c) Request the use of unmanned aircraft system (UAS) within the National Airspace System (NAS).

(d) The UAS will be used to inspect communication towers. The FCC requires that all communication towers, such as cell phone towers, be physically inspected every two years. Currently, this can only be accomplished by a human tower climber who actually climbs the entire height of the tower during the inspection process.

By allowing the use of the UAS in place of a tower climber, it would totally eliminate the possibility of someone falling off of a tower.

(e) Based on the self-imposed set of criteria listed below, the use of the UAS would have no impact on public safety. In fact, the use of the UAS would provide a greater level of safety that currently exists at this time.

1. Flight would be over private or controlled-access property.
2. Restrict flight to within 300 feet horizontally of the tower being inspected.
3. The vast majority of the flight will be in a vertical ascent/descent attitude, with very little forward flight.
4. The vertical height of the UAS shall not exceed the above ground level height of the tower.

5. UAS will weigh less than 55 pounds, including the camera.
6. UAS shall be inspected prior to each flight.
7. No operations shall be conducted at night.
8. The UAS shall be within line of sight of the operator at all times.

(f) (1) Requesting an exemption to Section 333 of the *FAA Modernization and Reform Act of 2012*.

(f)(2) Request the use of unmanned aircraft system (UAS) within the National Airspace System (NAS) and FAA exemptions from regulations that address general flight rules, pilot certificate requirements, manuals, maintenance and equipment mandates.

The UAS will be used to inspect communication towers. The FCC requires that all communication towers, such as cell phone towers, be physically inspected every two years. Currently, this can only be accomplished by a human tower climber who physically climbs the entire height of the tower during the inspection process.

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(g) Believe the use of an UAS does not need an FAA-issued certificate of airworthiness based on a finding they do not pose a threat to national airspace users or national security.