

## **APPLICATION/PETITION FOR EXEMPTION (Drone “UAV” Use)**

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### **STATED SECTION(S) FOR RELIEF SOUGHT**

**COMES NOW**, Cannery Row Films, LLC, herein after referred to as CRF, and does hereby submit and request exemptions to FAA Rules for drone (UAV) usage, and seeks stated Special Airworthiness Certificate - Experimental Category (SAC-EC). CRF is a domestic company that specializes in the production of videography and photography products for private and public clients. At all times, CRF’s carries insurance, is fully legal in the State of Florida and has NEVER operated a UAV at any time, prior to this application being filed.

### **RELIEF DEFINED FOR EXEMPTION**

On September 25, 2014, the Federal Aviation Administration announced it will allow the use of unmanned aerial vehicles (UAVs) on some U.S. film sets. The FAA more specifically said, this is “the first step to allowing the film and television industry the use of unmanned aircraft systems (UAS) in the National Airspace System.” The Motion Picture Association of America (MPAA) has been successful and complied with the FAA in the past and CRF and its associates pray to do the same.

Cannery Row Films, LLC is a registered Limited Liability Company that is fully insured and residing and operating in the State of Florida. At all times, Cannery Row Films has refrained from the use of Drones, while others have defied such regulations. It is in CRF’s best interests, that we hold the FAA’s regulations, laws and policies to the standards as set forth and by spirit and application, apply for this exemption as required,

rather than pushing an issue outside the purviews of said FAA requirements as so many other have done and continue to do in the State of Florida.

### **BENEFIT TO THE PUBLIC**

Since the applicant, CRF, more specifically Sean Murphy, has intimate, personal, functioning and real world training in aviation, we'd argue that his understanding and knowledge of the rules of flight, air traffic patterns, safety standards, aeronautics, time logged in aircraft, such as a Cessna 150, Cessna 152 and a Cessna 172, and hours in training in ground school instruction, he in fact presents a more safe and compliant operator of a UAV, than that of the known average user and operator, which as of the writing of this, is almost nonexistent. This applicant knows the safety threat these vehicles can pose to air traffic, the general public and others, and as such, since he has a working, and real world knowledge, his operation of a UAV is far superior than that of an operator that merely buys a UAV and then operates it outside the confines and guidelines/regulations of the FAA.

### **SAFETY AND ADHERENCE AND BENEFIT THEREOF**

CRF, shall at all times relevant, operate and adhere with their UAV, and understanding fully, ***“which must be flown within the line of sight of the operator, less than 400 feet above the ground, during daylight conditions, inside Class G (uncontrolled) airspace and more than five miles from any airport or other location with aviation activities.”***

### **ARGUMENT IN SUPPORT OF APPLICATION**

FAA Order 8130.34 is limited in scope. It does however address “civil operators” in a way that the spirit of it speaks to the private sector being “included” in the exemption process for the operation of UAV's. CRF, in the pursuit of their business specialty, understand the importance that UAV's now play in film production. Increasingly, because of ever increasing limitations of budgets, the use of UAV's has

become an attractive alternative to traditional aerial “film or photography shoots” for private sector clients, i.e., the Real Estate market and their professionals, survey companies, commercial sector clients, etc. A pure argument to UAV’s economic benefits is relative to and pertains to simple cost. (Example) A traditional hour of air time in a rotorcraft would be offered to a client at a minimum charge of \$369.00 per flight hour, whereas a UAV could accomplish the same tasks and produce the same results for a fraction of the cost in that time, and be done in an expedient manner. Typical flight time to secure the desired results for a particular (typical) client is less than (15) minutes of actual flight time. And, the flight ceiling would be no more than a few hundred feet, if that (emphasis added), which actually poses a safer environment for the surrounding areas, than that of a traditional vehicle, i.e., aircraft or rotorcraft. This is especially true in a developed area, such as a neighborhood.

CRF’s, shall at all times, ***and as a minimum, observe all applicable regulations of 14 CFR parts 61 and 91. This document is intended to identify alternate methods of compliance with the regulations when evaluating proposed UAS operations.*** Since CRF, in fact has, a person, in this case, the applicant himself, that was in fact, a student of flight, the applicant understands and has working knowledge of the rules of flight, air traffic patterns, safety standards, aeronautics, which CRF’s would argue is way beyond that of the typical and relevant average operator now existing and making use of an UAV.

### **SUMMARY**

**WHEREFORE**, the applicant, CRF (Sean Murphy), respectfully requests a (24) month exemption to lawfully, within the stated regulations of the FAA and others, and as stated, operate a UAV for the sole purpose of producing client results relating to film, videography and still photograph shoots. **FURTHER**, it is stated and affirmed here, that CRF (Sean Murphy) has made application for the required Special Airworthiness Certificate - Experimental Category (SAC-EC).

Respectfully submitted this 19<sup>th</sup> day of November, 2014.

*Sean Murphy*

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