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United States Department of Transportation

Docket Management System
1200 New Jersey Ave., SE
Washington, D.C. 20590

Attn: Bill Crozier, Assistant Manager, UAS Integration Office, AFS-80

Re: 1) Applicant: D&C Inspection Services, Inc.
2) Request for exemption Under Section 333 of the FAA Modernization
and Reform Act of 2012 (Reform Act)

Dear Mr. Crozier:

1. Applicant's name, address and contact number are:
D&C Inspection Services, Inc.
2215 Repsdorph Rd., Seabrook, Texas 77586
Attn: Daniel Harry
Email: dan@dcinspection.com
Phone No.: (281) 326-1800
2. Applicant's agent:
F.B. (Ben) Harvie, Jr., Attorney At Law
12600 N. Featherwood, Suite 120, Houston, Texas 77034
Email: bharvie@nhapllc.com
Phone No.: (281) 484-9500
3. Purpose for Request:
To secure an exemption to operate a sUAS under controlled conditions in defined airspace which would provide an enhanced level of safety to the successful operation of Applicant's business which includes, but is not limited to, inspection of industrial complexes, transportation facilities and other structural entities that are subject to and in need of periodic or routine safety inspections by persons authorized either by regulation or by industry standard

to determine the condition of the objects being inspected and to assure and establish a level of safe use and operations for which the inspected items are intended.

4. Regulation:

The exemptions requested and/or required are from 14 CFR and are as follows:

Part 21
45.23(b)
61.113 (a) & (b)
91.7 (a)
91.9 (b) (2)
91.103
91.109
91.119
91.121
91.151 (a)
91.203 (a) & (b)
91.405 (a)
407 (a) (1)
409 (a) (2)
417 (a) & (b); and

Any other provisions out of Title 14, Code of Federal Regulations, that may be applicable to Applicant's specific use and not listed above.

5. Public Interest:

Enhancement of Industry Safety.

The exemption requested is in the public interest because the intended purpose of the operation of sUAS will enhance the safety of the inspection process presently utilized by Applicant which may have required, from time-to-time, inspectors to be on scaffold structures or other dangerous environments, or other hazardous conditions, in order to perform the inspections which are necessary and required to comply with industry standards or governmental regulations.

Development of Firefighting Techniques

The public interest would also be enhanced because Applicant intends to develop a heat-sensing device for use by firefighting agencies that would detect dangerous hotspots, thereby reducing the hazardous work environment of firefighters and enhancing their rescue operations.

Protection of Privacy

Applicant has adopted a privacy policy that requires the operator to assure that no information or data of persons not engaged in the intended operation is collected, used, or disseminated so as to achieve the public's expectation of privacy.

6. Previous exemptions:

The FAA has previously granted exemptions under Section 333 for similar operations in Exemption Nos.:

1. 11063
2. 11064
3. 11065
4. 11066
5. 11067
6. 11080

7. Conditions and limitations:

A. Applicant proposes to adopt:

1. A Pilot Operating Handbook (POH) and/or
2. Flight Operations and Procedures Manual (FOPM)
3. Manufacturers Pilot Training Guide (MPTG)
4. UAV Check-List

B. Applicant proposes the following conditions and/or limitations:

1. UA must weigh less than 55 pounds;
2. UA airspeed not to exceed 50 knots;
3. UA flights may not operate at more than 400 AGL and Altitudes reported to ATC must be in feet AGL;
4. UA must be operated within visual line of sight (VLOS) of the PIC;
5. All operations will utilize a visual observer (VO). The VO may be utilized as long as the PIC maintains VLOS capability and can communicate with the VO at all times;
6. The conditions and limitations will be added or amended in the operator's manual;
7. The PIC will inspect the UAS to ensure it is safe for flight, along with the Ground Control Station (GCS) if utilized. All maintenance and alterations must be properly documented.
8. A functional test flight must be performed for any UAS that has undergone maintenance or alterations and be performed by the PIC and added to the operator's manual;
9. The operator must follow the manufacturer's UAS aircraft/component, maintenance, overhaul, replacement inspection and life limit requirements. The following must

be included in the operator's manual;

- A. Actuators / Servos;
 - B. Transmission (single rotor);
 - C. Power plant (motors);
 - D. Propellers;
 - E. Electronic speed controller;
 - F. Batteries;
 - G. Mechanical or dynamic components (single rotor);
 - H. Remote command and control;
 - I. Ground control station (if used); and
 - J. Any other component(s) as determined by the operator.
10. The PIC must possess a private pilot certificate, a current third-class medical certificate and meet the flight review requirements specified in 14 CFR § 61.56;
 11. A PIC must have accumulated and logged, in a manner consistent with 14 CFR § 61.51 (b), a minimum of 200 flight hours and 25 hours as a UAS rotorcraft pilot and at least ten hours logged as a UAS pilot with a similar UAS type;
 12. A PIC must have accumulated and logged, in a manner consistent with 14 CFR § 61.51 (b), a minimum of five hours as a UAS pilot operating the make and model of UAS to be utilized for operations under the exemption and three take-offs and three landings in the preceding 90 days. The PIC must operate the UA with appropriate distance from non-participants in accordance with 14 CFR § 91.119;
 13. The PIC and VO must have completed a qualification process;
 14. A flight demonstration, administered by an operator-approved and -qualified pilot must be completed and documented in accordance with the operator's manual;
 15. The UA may not be operated directly over any person, except authorized and consenting inspection personnel, below an altitude that is hazardous to persons or property;
 16. All participating persons must be essential and consent to the UAV operation which should require no further FSDO or ASI approval;
 17. The operator must ensure that no persons are allowed within 500 feet of the area except those consenting to be involved and who are necessary for the on-going operation of the entity being inspected;
 18. If the UAS loses communications or loses its Global Positioning System (GPS) signal, the UA must return to a

- pre-determined location within the security perimeter and land or be recovered in accordance with the operator's manual;
19. The UAS must abort the flight in the event of unpredicted obstacles or emergencies in accordance with the operator's manual;
 20. Each operation must be completed within 30 minutes flight time or with 25% battery power remaining, whichever occurs first;
 21. The operator must contain an Air Traffic Organization (ATO) issued Certificate of Waiver or Authorization (COA) prior to conducting any operations under this grant of exemption. This COA will also require the operator to request a Notice to Airman (NOTAM) not more than 72 hours in advance, but no less than 48 hours prior to the operation;
 22. All aircraft operated in accordance with this exemption must be identified by serial number, registered in accordance with 14 CFR part 47 and have identification (N-Number) markings in accordance with 14 CFR part 45, Subpart C. Markings must be as large as possible;
 23. The operator must develop procedures to document and maintain a record of the UAS maintenance, alterations, status of replacement/overhaul component parts, and the total time in service of the UAS.
 24. Each UAS operated under this exemption will comply with all manufacturing safety bulletins;
 25. The operator will develop UAS technician qualification criteria. And the criteria will be in the operator's manual;
 26. The pre-flight inspections section of the operator's manual will include the requirement that the pre-flight inspection will account for all discrepancies, i.e. inoperable components, items, or equipment;
 27. Before conducting operations, the radio frequency spectrum used for operation and control of the UA will comply with the FCC or other appropriate government oversight agency requirements;
 28. At least three days before a scheduled inspection the operator of the UAS affected by this exemption will submit a written plan of activity to the local FSDO with jurisdiction over the area of the proposed inspection. The 3-day notification may be waived with the concurrence of the FSDO. The plan of activities will include the following:
 - A. Dates and times for all flights

- B. Name and phone number of the operator for the UAS inspection conducted under this grant of exemption
 - C. Name and phone number of the person responsible for the on-site operation of the UAS
 - D. Make, model, and serial or N-number of UAS to be used
 - E. Name and certificate number of UAS PIC s involved in the inspection process
 - F. A statement that the operator has obtained permission from property owners and/or local officials to conduct the inspection; the list of those who gave permission shall be made available to the inspector upon request
 - G. Signature of exemption-holder or representative
 - H. The description of the flight activity, including maps or diagrams of any area, city, town, county, and/or state over which the inspection will be conducted and the altitudes essential to accomplish the operation.
29. The documents required under 14 CFR §§91.9 and 91.203 must be available to the PIC at the ground control station of the UAS any time the aircraft is operating. These documents must be made available to the Administrator or any law enforcement official upon request;
 30. The UA must remain clear and yield the right of way to all other manned operations and activities at all times (including, but not limited to ultra-light vehicles, parachute activities, parasailing activities, hand gliding, etc.);
 31. UAS operations may not be conducted during night, as defined in 14 CFR § 1.1 All operations must be conducted under visual meteorological conditions (VMC). Flights under special visual flight rules (SVFR) are not authorized;
 32. The UAS cannot be operated by the PIC from any moving device or vehicle;
 33. The UA may not be operated less than 500 feet below or less than 2000 feet horizontally from a cloud or when visibility is less than 3 statute miles from the PIC;
 34. The UA may not be operated in class B, C, or D airspace without written approval from the FAA. The UA may not operate within 5 nautical miles of the geographic center of a non-towered airport as denoted on a current FAA- published aeronautical chart unless a letter of agreement with the airport's management is obtained, and the operation is conducted in accordance with a NOTAM as required by the operator's COA. The letter of agreement with the airport

management must be made available to the administrator upon request.

35. Any 1) Incident, 2) Accident, or 3) Flight operation that transgresses the lateral or vertical boundaries of the operational area as defined by the applicable COA must be reported to the Federal Aviation Administration's (FAA) UAS Integration Office (AFS-80) within 24 hour. Accidents must be reported to the National Transportation Safety Board (NTSB) per instruction contained on the NTSB web site: www.nts.gov. Further flight operations may not be conducted until the incident, accident, or transgression is reviewed by the AFS-80 and authorized to resume operations is provided.
36. The UAS, PIC and operator will comply with all applicable parts of 14 CFR including, but not limited to, parts 45,47,61,91.

The criteria proposed in this application are believed to have previously been reviewed and approved with prior exemptions and given the public need for the inspections mandated by regulation or suggested by industry standards provides the assurance sought by the Federal Aviation Act of 1958 and the FAA modernization and reform act of 2012 to ensure the safe operations anticipated in this request of the aircraft in the national airspace system.

Your review and reply are greatly appreciated. My office is adjacent to the FSDO office on Featherwood in Houston, Texas and would facilitate our in person communication should it be necessary.

Very Truly Yours,

NOVELLI, HARVIE & Associates
Attorneys at law, PLLC



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