

September 25, 2014

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DEPARTMENT OF
TRANSPORTATION
SECRET OPERATIONS
2014 NOV -3 P 1:54

United States Department of Transportation Docket Management System
1200 New Jersey Ave
SE West Building Ground Floor Room W12-140
Washington, DC 20590

Re: Exemption Request Pursuant To Section 333 of the FAA Reform Act of 2012

Dear FAA,

We are writing regarding the FAA Modernization and Reform Act of 2012 (the "Reform Act") and the procedures contained in:

14 C.F.R. 11

Elevated Perspective Media, an operator of small-unmanned aircraft, is requesting to be exempted from the Federal Aviation Regulations listed below. So that ELEVATED PERSPECTIVE MEDIA may operate its lightweight unmanned aircraft systems ("UAS") commercially in airspace regulated by the Federal Aviation Administration ("FAA"). As long as Elevated Perspective Media's operations are conducted within the established by the FAA as required by Section 333.

The conditions identified and proposed by the applicant are drawn from:

Order 8900.1 CHG 0, Volume 3, Chapter 8-Issue a Certificate of Waiver for Motion Picture and Television Filming.

Thomas Webb, Chris Walsh and Judson Bell and Their company: ELEVATED PERSPECTIVE MEDIA is an experienced company and the combined years of knowledge in the film industry exceeds 40 years. ELEVATED PERSPECTIVE MEDIA and its members have been working with special effects on set for great movies like Fast and the Furious, the Green Lantern and Shutter Island. More importantly we have over 100 hours of flight training in the physical world and over 200 hours on a simulator.

ELEVATED PERSPECTIVE MEDIA has been involved in the technical development of UAS's to provide high quality aerial cinematography with small, unmanned aircraft. ELEVATED PERSPECTIVE MEDIA has been working with multirotors for over 5 years, developing technical and practical expertise. ELEVATED PERSPECTIVE MEDIA is also currently developing a curricula for future (with the blessing of the FAA) a certification process for uas pilots.

Elevated Perspective Media's request to film and produce high quality video exclusively for film and production companies would allow it to be the vanguard of safety and correct flight procedures. Elevated Perspective Media already has a detailed safety plan in place with numerous fail-safes to insure safety to all involved. Above all else is our concern for safety.

Allowing Elevated Perspective Media to operate is productive to not only our benefit but also to numerous other industries, as we are adding to a burgeoning industry and creating jobs in an otherwise down economy.

Elevated Perspective Media respectfully requests the grant of an exemption allowing it to operate lightweight, remote controlled UAS'Ss.

The Specific Sections of Title 14 of the Code of Federal Regulations, Elevated Perspective Media Requests Exemption are:

14 CFR 21

14 CFR 45.23(b)

14 CFR 61.113 (a) & (b)

14 CFR 61.3 (a) (1) (i) -----(as none of us has a pilot's license, this, I believe this is the rule that would exempt us from that requirement, our pic (pilot in command, either Chris Walsh or Thomas Webb has over 5 years experience flying UAS's and hundreds of hours on a simulator.)

91.7 (a)

91.9 (b) (2)

91.103(b)

91.105

91.109

91.119

91.121

91.151(a)

91.203(a) & (b)

91.405 (a)

91.407(a) (1)

91.409 (a) (2)

91.417 (a) & (b).

Elevated Perspective Media's reasons for relief are simple: Without the exemption our business is not viable, we will not operate our business of cinematic filming on closed sets without the FAA's blessing. ELEVATED PERSPECTIVE MEDIA realizes that reasons for relief are more complex than stated directly above, below are reasons why we would like to fly and why it makes America a better place. We seek relief to be the leading voice of safety and responsible practices when it comes to filming with UAS's.

112 P.L. 95 §§ 331-334

Elevated Perspective Media is seeking relief from any currently applicable FARs to prevent us from working on a closed set cinematic production. The Reform Act in Section 332 provides for such integration of civil unmanned aircraft systems into our national airspace system as it is in the public's interest to do so. Elevated Perspective Media lightweight UASs meet the definition of "small unmanned aircraft" as defined in Section 331 and therefore the integration of Elevated Perspective Media lightweight UAS'S are expressly contemplated by the Reform Act. Elevated Perspective Media would like to operate its lightweight UAS'S prior to the time period by which the Reform Act requires the FAA to promulgate rules governing such craft.

The Reform Act guides the Secretary in determining the types of UAS'S that may operate safely in our national airspace system. Considerations include: The weight, size, speed and overall capabilities of the UAS; Whether the UAS will be operated near airports or populated areas; and, Whether the UAS will be operated by line of sight.

Each of these items urges in favor of an exemption for Elevated Perspective Media:

a) Elevated Perspective Media UAS'S has:

- an Aerovionics Sky Jib frame with a DJI A2 flight system
- Tiger Motors, considered the best in the industry
- A Futaba transmitter, also considered an industry leader
- Eight counter-rotating propellers for extreme balance, control and stability.
- Weigh less than 55 pounds, including cinematic or other equipment.
- Hover in place and operate at less than a 50-knot maximum speed.
- Line of sight of the remote control pilot.
- At all times there is a spotter, pilot and a cameraman.

b) Elevated Perspective Media uses battery power:

- Uses battery power and not carbon fuel.
- Never does the battery go below 25% capacity with safeguards not only on the battery itself but also on the safety system.
- GPS system is in place to control the UAS if any loss of connection occurs

c) Elevated Perspective Media follows AMA guidelines

- does not operate its UASs near airports and generally does not operate them near populated areas.
- The UAS operating software and GPS navigation systems do not allow any of the Elevated Perspective Media UAS vehicles to operate near airports or restricted fly zones.
- The failsafe software will disable the UAS vehicles from taking off and also limit the UAS systems from operating within specific GPS preset no-fly zones. To date, Elevated Perspective Media has only operated its fleet as prescribed by the AMA. Elevated Perspective Media only operates its UASs in predetermined areas and only in compliance with well regarded safety protocols such as those contained within the well established and commonly known Motion Picture and Television Operations Manual.

Elevated Perspective Media operation of its fleet of small-unmanned aircraft will not "create a hazard to users of the national airspace system or the public." 112 P.L. 95 § 333 (b). Given the small size and weight of Elevated Perspective Media UASs, combined with their operation in cordoned off and well-controlled areas, Elevated Perspective Media fleet falls within Congress's contemplated safety zone when it authored the Reform Act and the corresponding directive to integrate UASs into the national airspace system. Indeed, Elevated Perspective Media UASs have a demonstrable safety record and do not pose any threat to the general public or national security.

The FAA has the authority to issue the exemption to Elevated Perspective Media pursuant to:

The Federal Aviation Act, 85 P.L. 726 (1958)

As a public benefit Elevated Perspective Media will advance:

- research into future safety guidelines for the use of UAS
- Reducing dangers by limiting the use of larger helicopters,
- Reducing carbon emissions.
- Advancement of art.
- Advancement of science through advanced data collection.

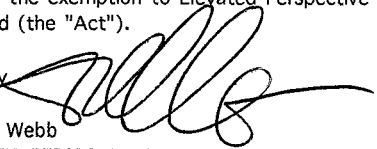
Elevated Perspective Media Exemption will not alter or change safety to the public and if fact, advance it, here are the reasons why:

- Longer flight times equal more practice.
- Elevated Perspective Media UASs weigh less than 55 pounds
- Elevated Perspective Media only operates its UASs below 400 feet
- Elevated Perspective Media UASs only operate for 5-16 minutes per flight
- Elevated Perspective Media lands its UASs when they reach 25% battery power
- Elevated Perspective Media remote control pilots operate by line of sight.
- Elevated Perspective Media staffs each flight with a pilot, cameraman and a spotter.
- Elevated Perspective Media UAS'S have gps modes to control UAS when communication is lost.
- Elevated Perspective Media only operates in secured areas that are strictly controlled.
- Elevated Perspective Media uses safety meetings before and after each flight to ensure protocols are used.
- Elevated Perspective Media always obtains all necessary permissions and permits prior to operation.

The bottom line is safety is our number one priority and adhering to a strict protocol is of the utmost importance. Granting this exemption would allow us to be the vanguard for safety and correct protocol for uas.

Elevated Perspective Media respectfully requests that the FAA grant its exemption request. The FAA has the authority to issue the exemption to Elevated Perspective Media pursuant to the Federal Aviation Act, 85 P.L. 726 (1958), as amended (the "Act").

Sincerely,


Thomas Webb
ELEVATED PERSPECTIVE MEDIA
Treasurer