

RJ DOUGHERTY, JR., LLC
Attorney at Law

Robert J. Dougherty, Jr., Esq.
36 Bingham Avenue
Rumson, New Jersey 07760
P: 732-530-5800
F: 732-530-5801

January 15, 2015
U. S. Department of Transportation
Docket Management System
1200 New Jersey Ave., SE
Washington, DC 20590

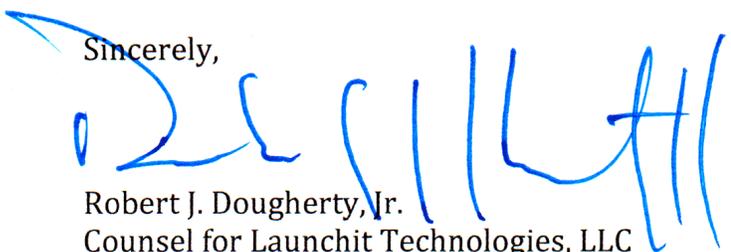
Dear Sir or Madam:

Attached please find Launchit Technologies, LLC ("Launchit") request for an exemption from the listed Federal Aviation Regulations to allow commercial operation of its Small Unmanned Aircraft Systems ("UASs") for aerial imaging, safety and monitoring of secured and controlled environment of Telecommunication/Cell tower sites. This exemption request is exclusively for the use of the UAS manufactured and operated by Launchit Technologies, LLC, a New Jersey based company.

Also attached to this letter is the Launchit Technologies UAS Flight Manual ("the Manual"), which outlines the operating requirements, limitations, maintenance and technical specifications for the Launchit Technologies UAS system. Applicant submits this Manual as proprietary information pursuant to 14 CFR 11.35(b). The Manual contains operating conditions and procedures that are not available to the public and are protected from release under the Freedom of Information Act 5 USC 552 et. seq.

Thank you for your time and consideration, and please let me know if you have any questions.

Sincerely,


Robert J. Dougherty, Jr.
Counsel for Launchit Technologies, LLC

January 15, 2014
U. S. Department of Transportation Docket
Management System
1200 New Jersey Ave., SE
Washington, DC 20590

Re: Exemption Request Section 333 of the FAA Reform Act and Part 11 of the Federal Aviation Regulations from 14 CFR Part 21; 14 CFR 61.113 (a) & (b); 91.7 (a); 91.9 (b) (2); 91.103(b); 91.109; 91.119(c); 91.121; 91.151(a); 91.203(a) & (b); 91.405 (a); 91.407(a) (1); 91.409(a)(1) & (a)(2) ; 91.417 (a) & (b).

Dear Sir or Madam:

Pursuant to Section 333 of the FAA Modernization and Reform Act of 2012 (the Reform Act) and 14 C.F.R. Part 11, Launchit, LLC ("Launchit"), developer and operator of Small Unmanned Aircraft System(s) ("UASs"), hereby applies for an exemption from the listed Federal Aviation Regulations ("FAR") to allow commercial operation of its UASs for aerial imaging of structures, equipment condition, safety and monitoring of Telecommunication / Cellular Towers in a secured and controlled environment, so long as such operations are conducted within and under the conditions outlined herein or as may be established by the FAA as required by Section 333.

As detailed in this document and the attached UAS Flight Manual , the requested exemption would permit the operation of UAS under controlled conditions in airspace that is 1) limited 2) predetermined 3) controlled as to access and 4) would provide safety enhancements best practices safety protocols followed by Launchit at Telecommunication/ Cellular Tower sites. Approval of this exemption would thereby enhance safety and fulfill the Secretary of Transportation's (the FAA Administrator's) responsibilities to "...establish requirements for the safe operation of such aircraft systems in the national airspace system." Section 333(c) of the Reform Act.

The name and address of the applicant is:

Launchit Technologies LLC
Sedim Al-Araji
PH: 732-693-8834
Email: sedim@launchit.com
Address: 70 Fair Haven Road, Fair Haven NJ 07704

Regulations from which the exemption is requested:

14 C.F.R. Part 21
14 C.F.R. 61.113 (a) & (b)
14 C.F.R. 91.7 (a)
14 C.F.R. 91.9 (b)(2)
14 C.F.R. 91.103 (b)
14 C.F.R. 91.119(c)

14 C.F.R. 91.121
14 C.F.R. 91.151 (a)
14 C.F.R. 91.203 (a) & (b)
14 C.F.R. 91.405 (a)
14 C.F.R. 407 (a)(1)
14 C.F.R. 409 (a)(1) & (a)(2)
14 C.F.R. 417 (a) & (b)

STATUTORY AUTHORITY FOR EXEMPTIONS

The Federal Aviation Act expressly grants the FAA authority to issue exemptions. This statutory authority includes exempting civil aircraft, as the term is defined under §40101 of the Act, including UASs, from the requirement that all civil aircraft must have a current airworthiness certificate.

The Administrator may grant an exemption from a requirement of a regulation prescribed under subsection (a) or (b) of this section or any sections 44702-44716 of this title if the Administrator finds the exemption in the public interest. 49 U.S.C. §44701(f) See also 49 USC §44711(a); 49 USC §44704; 14 CFR §91.203(a)(1).

Section 333(b) of the Reform Act assists the Secretary in determining whether UAS may operate in the National Airspace System (NAS) without creating a hazard to the user, the public, or a threat to national security. In making this determination, the Secretary must consider:

- The UAS's size, weight, speed, and operational capability;
- Whether the UAS operates within the visual line of sight of the PIC;
- Whether the UAS operates outside of highly populated areas and away from close proximity to airports.

Reform Act §333(a). If the Secretary determines that a UAS "may operate safely in the national airspace system, the Secretary shall establish requirements for the safe operation of such aircraft in the national airspace system." *Id.* §333(c).

Launchit's UASs are multi-rotor vehicles, weighting 15 or fewer lb. including payload. They operate under normal conditions at a speed of no more than 50 mph and have the capability to hover, and move in the vertical and horizontal plane simultaneously. The UASs will be operated by an FAA Licensed Pilot-In-Command (PIC) with a private pilot certificate and a third-class airman medical certificate. The UASs will operate only in the visual line of sight (VLOS) of the PIC at all times and operations will utilize a visual observer (VO) at all times. Operations will take place only within the sterile area described in the Confidential Launchit Technologies Aircraft Flight & Operations Manual, attached as Exhibit 1 (hereinafter "the Manual"). Such operations will insure that the UASs will "not create a hazard to users of the national airspace system or the public." Reform Act Section 333 (b).

Given the small size of the UASs involved and the restricted and sterile environment within which they will operate, our application falls squarely within the zone of

safety (an equivalent level of safety) in which Congress envisioned that the FAA must, by exemption, allow commercial operations of UASs to commence immediately.

Pilots holding an FAA issued private or commercial pilot certificate are subject to the security screening by the Department of Homeland Security that certificated airmen undergo. In addition, due to the small size/weight of the UASs, the low altitudes and restricted areas in which our UASs will operate, approval of the application presents no national security issues.

Given the clear direction in Section 333 of the Reform Act, the authority contained in the Federal Aviation Act, as amended; the strong equivalent level of safety surrounding the proposed operations, and the significant public benefit, including enhanced safety, the grant of the requested exemptions is in the public interest. Accordingly, Launchit Technologies respectfully requests that the FAA grant the requested exemption without delay.

PUBLIC INTEREST

This exemption application is expressly submitted to fulfill Congress' goal in passing Section 333(a) through (c) of the Reform Act. This law directs the Secretary of Transportation to consider whether certain unmanned aircraft systems may operate safely in the NAS before completion of the rule making required under Section 332 of the Reform Act. By granting an exemption the FAA will fulfill Congress's intent of allowing UAS to operate with significant safety precautions in low risk environments.

Tower climbing, has been called the most dangerous job in America. There have been 19 climber deaths and numerous injuries in telecommunication towers accidents since the start of 2013. The use of UASs on telecommunication towers can significantly reduce the risk to workers of falls while inspecting, surveying, or monitoring. A UAS can inspect, photograph, and collect data on hard to get to areas that otherwise would require worker inspection. Falls are the leading source of workplace fatality and injury, and reducing falls through UAS use for site imaging could save workers lives.

Additionally, a UAS could replace the use of helicopters and small aircraft to monitor sites. The UASs we propose to fly in this application are under 15 pounds, and carry no combustible material on board, as opposed to the much larger conventionally powered small aircraft. Shifting to UASs from helicopters presents a marked safety increase for our workers and the public.

Lastly, UASs reduce the environmental impact by dramatically decreasing the energy used for aerial imaging and data collection over telecommunication towers. Our UASs use rechargeable lithium ion batteries, as opposed to fossil fuels burned in operation of small aircraft that are many hundreds of times heavier.

EQUIVALENT LEVEL OF SAFETY

Launchit proposes that the exemption requested herein apply to civil aircraft that have the characteristics and that operate with the limitations listed herein. These limitations provide for at least an equivalent or even higher level of safety to operations under the current regulatory structure because the proposed operations represent a safety enhancement to the already safe protocols followed telecommunications/cell tower sites and imaging and surveying operations conducted with helicopters and other conventional aircraft.

Launchit will be bound by the following when conducting its UAS operations under an FAA issued exemption:

1. The UA will be weigh less than 15 pounds.
2. Flights will not be flown at an indicated air speed exceeding 50 mph (43.3 knots).
3. Flights will be operated at or below an altitude never exceeding 400 feet AGL.
4. The UA will be operated within visual line of sight (VLOS) of the PIC at all times.
5. All operations will utilize a visual observer (VO). The VO may be used to satisfy the VLOS requirement as long as the PIC always maintains VLOS capability. The VO and PIC will communicate verbally at all times.
6. The PIC will follow the operations and maintenance procedures outlined in the UAS Flight Manual at all times.
7. Prior to each flight the PIC must inspect the UAS to ensure it is in a condition for safe flight as outlined in the UAS Flight Manual.
8. Any UA that has undergone maintenance or alterations that affect the UAS operation or flight characteristics will undergo a functional test flight in accordance with the UAS Flight Manual.
9. The PIC will possess at least a private pilot certificate and a third-class airman medical certificate. The PIC must also meet the flight review requirements specified in 14 CFR § 61.56 in an aircraft in which the PIC is rated on his or her pilot certificate.
10. Launchit Technologies will not permit any PIC to operate unless that PIC has demonstrated through Launchit's training and currency requirements that the PIC is able to safely operate the UAS in a manner consistent with how the UAS will be operated as outlined in the UAS Flight Manual, including evasive and emergency maneuvers and maintaining appropriate distances from people, vessels, vehicles and structures.
11. UAS operations will not be conducted during night, as defined in 14 CFR § 1.1. All operations will be conducted under visual meteorological conditions (VMC). Flights under special visual flight rules (SVFR) will not be conducted.
12. The UA will not operate within 5 nautical miles of the airport reference point of an airport as denoted on a current FAA-published aeronautical chart. The UA

may not operate within 3 nautical miles from any city or densely populated area.

13. The UA may not be operated less than 500 feet below or less than 2,000 feet horizontally from a cloud or when visibility is less than 3 statute miles from the PIC.
14. If the UAS loses communications or loses its GPS signal, the UA will return to a pre-determined location within the private or controlled-access property and land or be recovered in accordance with the UAS Flight Manual.
15. The PIC will abort the flight in the event of unpredicted obstacles or emergencies in accordance with the UAS Flight Manual.
16. The PIC is prohibited from beginning a UAS flight unless (considering wind and forecast weather conditions and assuming normal cruising speed) there is enough power to fly to the first point of intended landing prior to utilizing battery reserve power.
17. The operator will obtain an Air Traffic Organization (ATO) issued Certificate of Waiver or Authorization (COA) prior to conducting any operations. This COA will also require the operator to request a Notice to Airman (NOTAM) not more than 72 hours in advance, but not less than 48 hours prior to the operation.
18. All aircraft operated will 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 will be as large as practicable.
19. Before conducting operations, the radio frequency spectrum used for operation and control of the UA must comply with the Federal Communications Commission (FCC) or other appropriate government oversight agency requirements.
20. The documents required under 14 CFR 91.9 and 91.203 will be available to the PIC at the Ground Control Station of the UAS any time the aircraft is operating. These documents will be made available to the Administrator or any law enforcement official upon request.
21. The UA will remain clear and yield the right of way to all other manned aviation operations and activities at all times.
22. The UA will not be operated by the PIC from any moving device or vehicle.
23. The UA will not be operated over congested or densely populated areas. These areas include but are not limited to the yellow areas depicted on World Aeronautical Charts (WAC), Sectional Aeronautical Charts (Sectionals), or Terminal Area Charts (TAC).
24. Flight operations will be conducted at least 500 feet from all nonparticipating persons (persons other than the PIC or VO), vessels, vehicles, and structures unless:
 - a. Barriers, fencing or structures are present that sufficiently protect nonparticipating persons from debris in the event of an accident. The operator will ensure that nonparticipating persons remain under such

- protection. If a situation arises where nonparticipating persons leave such protection and are within 500 feet of the UA, flight operations will cease immediately and/or;
- b. the aircraft is operated near vessels, vehicles or structures where the land owner/controller has granted permission and the PIC has made a safety assessment of the risk of operating closer to those objects and;
 - c. operations near the PIC or VO do not present an undue hazard to the PIC or VO, per § 91.119(a).
25. All operations shall be conducted over private or controlled-access property with permission from the land owner/controller or authorized representative. Permission from land owner/controller or authorized representative will be obtained prior to the beginning of every flight.
26. Any incident, accident, or flight operation that transgresses the lateral or vertical boundaries of the operational area as defined by the applicable COA will be reported to the FAA's UAS Integration Office (AFS-80) within 24 hours. Accidents will be reported to the National Transportation Safety Board (NTSB) per instructions contained on the NTSB Web site: www.nts.gov.

DESCRIPTION OF SPECIFIC REGULATIONS

Regarding the Unmanned Aircraft System (UAS)

14 CFR Part 21, Subpart H: Airworthiness Certificates 14 C.F.R. §91.203(a)(1)

Subpart H, entitled Airworthiness Certificates, establishes the procedural requirements for the issuance of airworthiness certificates as required by FAR §91.203 (a) (1). Given the size and limited operating area associated with the aircraft to be utilized by the Launchit, an exemption from Part 21 Subpart H meets the requirements of an equivalent level of safety under Part 11 and Section 333 of the Reform Act. The Federal Aviation Act (49 U.S.C. §44701 (f)) and Section 333 of the Reform Act both authorize the FAA to exempt aircraft from the requirement for an airworthiness certificate, upon consideration of the size, weight, speed, operational capability, and proximity to airports and populated areas of the particular UAS. Our small UAS will be operated at low speed in a controlled environment, at least five miles from an airport and more than three miles from any city or densely populated area. An analysis of these criteria demonstrates that the UAS operated without an airworthiness certificate, in the restricted environment and under the conditions proposed will be at least as safe, or safer, than a conventional aircraft (fixed wing or helicopter) operating with an airworthiness certificate without the restrictions and conditions proposed.

The UAS to be operated hereunder is less than 15 lb. fully loaded, carries neither a pilot nor passenger, carries no explosive materials or flammable liquid fuels, and operates exclusively within a secured area as set out in the Manual. Like other civil aircraft, operations under this exemption will be tightly controlled and monitored by the operator,

pursuant to the Manual's requirements, and under the requirements and in compliance with local public safety requirements, to provide security for the area of operation as is currently done on active Telecommunication/Cell tower sites. The FAA will have advance notice of all operations.

These safety enhancements, which already apply to civil aircraft operated in connection with Telecommunication/Cell towers, provide a greater degree of safety to the public and property owners than conventional operations conducted with airworthiness certificates issued under 14 C.F.R. Part 21, Subpart H. Lastly, application of these same criteria demonstrates that there is no credible threat to national security posed by the UAS, due to its size, speed of operation, location of operation, lack of explosive materials or flammable liquid fuels.

14 CFR 91.405 (a); 407 (a)(1); 409 (a)(1) & (a)(2); 417 (a) & (b): Maintenance inspections

These regulations require that an aircraft operator or owner "shall have that aircraft inspected as prescribed in subpart E of this part and shall between required inspections, except as provided in paragraph (c) of this section, have discrepancies repaired as prescribed in part 43 of this chapter..." and others shall inspect or maintain the aircraft in compliance with Part 43.

Given that these section and Part 43 apply only to aircraft with an airworthiness certificate, these sections will not apply to Launchit. Maintenance will be accomplished by the operator pursuant to the UAS Flight Manual (See section 5 of the manual). An equivalent level of safety will be achieved because these small UASs are very limited in size and will carry a small payload and operate only in restricted areas for limited periods of time. If mechanical issues arise the UAS can land immediately and will be operating from no higher than 400 feet AGL. As provided in the Manual, the operator will ensure that the UAS is in working order prior to initiating flight, perform required maintenance, and keep a log of any maintenance performed. Moreover, the manufacturer and operator is most familiar with the aircraft and best suited to maintain the aircraft in an airworthy condition to provide the equivalent level of safety.

Regarding the Pilot In Command (PIC) of the UAS and Visual Observer (VO)

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

Sections 61.113 (a) & (b) limit private pilots to non-commercial operations. Because the UAS will not carry a pilot or passengers, the proposed operations can achieve the equivalent level of safety of current operations by requiring the PIC operating the UAS to possess at least a private pilot certificate and a third-class airman medical certificate. The PIC will also meet the flight review requirements specified in 14 CFR § 61.56 in an aircraft in which the PIC is rated on his or her pilot certificate. In addition,

the PIC will have to complete the UAS flight training requirements prior to commercial operations as provided in section 6 of the UAS Flight Manual.

All operations will utilize a visual observer (VO). The VO may be used to satisfy the VLOS requirement as long as the PIC always maintains VLOS capability. The VO and PIC will communicate verbally at all times. It is the responsibility of the PIC to be aware of the VO's visual limitations and limit operations of the UA to distances within the visual capabilities of both the PIC and VO. The VO will not be operating the aircraft.

Unlike a conventional aircraft that carries the pilot and passengers, the UAS is remotely controlled with no living thing or cargo on board. The area of operation is controlled and restricted, and all flights are planned and coordinated in advance as set forth in the Manual. The risks associated with the operation of the UAS are so diminished from the level of risk associated with commercial operations contemplated by Part 61 when drafted, that allowing operations of the UAS as requested above with a PIC and a VO who has met the minimum requirements stated in Section 2.8 of the manual exceeds the present level of safety achieved by 14 C.F.R. §61.113 (a) & (b).

Regarding the Operating parameters of the UAS

14 C.F.R. 91.7 (a): Civil aircraft airworthiness

The regulation requires that no person may operate a civil aircraft unless it is in airworthy condition. As there will be no airworthiness certificate issued for the aircraft, should this exemption be granted, no FAA regulatory standard will exist for determining airworthiness. Given the size of the aircraft and the requirements contained in the Manual for maintenance and use of safety checklists prior to each flight, as set forth in Section 4.0 of the manual, an equivalent level of safety will be provided.

14 CFR 91.9 (b)(2): Civil Aircraft Flight Manual, marking, and placard requirements

The UAS, given its size and configuration has no ability or place to carry such a UAS Flight Manual on the aircraft, not only because there is no pilot on board, but because there is no room or capacity to carry such an item on the aircraft.

The equivalent level of safety will be maintained by keeping the UAS Flight Manual at the ground control point where the pilot flying the UAS will have immediate access to it.

Based on the FAA Memorandum “Interpretation regarding whether certain required documents may be kept at an UA’s control station,” dated August 8, 2014 the requested relief from §§ 91.9(b)(2) may not be necessary.

In addition, the FAA has issued the following exemptions to this regulation: Exemption Nos. 8607, 8737, 8738, 9299, 9299A, 9565, 9565B, 10167, 10167A, 10602, 32827, and 10700.

14 CFR 91.203 (a) & (b): Carrying civil aircraft certification and registration

The regulation provides in part:

(a) Except as provided in § 91.715, no person may operate a civil aircraft unless it has within it the following:

(1) An appropriate and current airworthiness certificate...b) No person may operate a civil aircraft unless the airworthiness certificate required by paragraph (a) of this section or a special flight authorization issued under §91.715 is displayed at the cabin or cockpit entrance so that it is legible to passengers or crew.

The UAS fully loaded weighs no more than 15 lb. and is operated without an onboard pilot. Therefore there is no ability or place to carry certification and registration documents or to display them on the UA.

An equivalent level of safety will be achieved by keeping these documents at the ground flight control point where the pilot flying the UAS will have immediate access to them, to the extent they are applicable to the UAS. The FAA has issued numerous exemptions to this regulation. A representative sample of other exceptions includes Exemption Nos. 9565, 9665, 9789, 9789A, 9797, 9797A, 9816A, and 10700.

In addition, based on the FAA Memorandum “Interpretation regarding whether certain required documents may be kept at an UA’s control station,” dated August 8, 2014 the requested relief from 91.203 (a) & (b) may not be necessary.

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

This regulation requires each pilot in command take certain actions before flight to ensure the safety of flight. An exemption is needed from this requirement as the pilot will take separate preflight actions, including checking for weather conditions, checking flight battery requirements, checking takeoff and landing distances, and all other actions in the Preflight Checklist in Section 4.0 of the Manual. These actions will provide an equivalent level of safety.

14 C.F.R. 91.109: Flight Instruction

Section 91.109 provides that no person may operate a civil aircraft (except a manned free balloon) that is being used for flight instruction unless that aircraft has fully functioning dual controls.

By design, UASs and remotely piloted aircraft do not have fully functional dual controls. Flight control is accomplished through the use of a control box that communicates with the aircraft via radio communications. As a result, training will be conducted during dedicated sessions to a UAS PIC that possesses at least a private pilot's certificate and as described in Section 6 of UAS Flight Manual.

The FAA has previously approved exemptions for aircraft without fully functional dual controls. See Exemption Nos.5778K & 9862A. The equivalent level of safety provided by the fact that neither a pilot nor passengers will be carried in the aircraft, the ability to control the UAS via radio signals from the controller, and by the size and speed of the aircraft.

14 C.F. R. 91.119(c): Minimum Safe Altitudes

Section 91.119(c) prescribes that, except when necessary for takeoff or landing, no person may operate an aircraft below the following altitudes: (c) *Over other than congested areas.* An altitude of 500 feet above the surface, except over open water or sparsely populated areas. In those cases, the aircraft may not be operated closer than 500 feet to any person, vessel, vehicle, or structure.

This exemption is for a multi-rotor craft that flies similarly to a helicopter, with vertical take off and vertical landing, which will typically operate at altitudes from 0 feet to 400 feet AGL, so an exemption may be needed to allow such operations. The UAS will never operate at altitude higher than 400 AGL and will be in a restricted area with security perimeter, where buildings and people will not be exposed to operations without their pre-obtained consent. See section 2.10 of UAS Flight Manual for detailed description.

The equivalent level of safety can be achieved where all UAS Flight operations will be conducted at least 500 feet from all nonparticipating persons (persons other than the PIC or VO), vessels, vehicles, and structures unless:

- a. Barriers, fencing or structures are present that sufficiently protect nonparticipating persons from debris in the event of an accident. The operator will ensure that nonparticipating persons remain under such protection. If a situation arises where nonparticipating persons leave such protection and are within 500 feet of the UA, flight operations will cease immediately and/or;
- b. the aircraft is operated near vessels, vehicles or structures where the land owner/controller has granted permission and the PIC has made a safety assessment of the risk of operating closer to those objects and;

- c. operations near the PIC or VO do not present an undue hazard to the PIC or VO, per § 91.119(a).

See section 2.9 and 2.10 of the UAS Flight Manual for detailed description.

In addition, the equivalent level of safety will be achieved given the size, weight, speed of the UAS as well as the location where it is operated. No flight will be taken without the permission of the property owner or local officials. Because of the advance notice to the property owner/controller as outlined in section 2.11(a) and (b) of the Manual, all concerned entities will be aware of the planned flight operations. Compared to flight operations with aircraft or rotorcraft weighting far more than the maximum 15 lb. proposed herein and carrying flammable fuel, any risk associated with our operations is far less than those presently presented with helicopters and other conventional aircraft operating at or below 500 AGL in the telecommunications industry.

14 C.F.R. 91.121: Altimeter Settings

This regulation requires each person operating an aircraft to maintain cruising altitude by reference to an altimeter that is set "...to the elevation of the departure airport or an appropriate altimeter setting available before departure." As the UAS may not have a barometric altimeter, but instead a GPS altitude read out, an exemption may be needed.

The UA will automatically provide onboard GPS altitude information to the UAS PIC via a radio communications telemetry data link, which downlinks from the aircraft to the PIC and is displayed on the Ground Station Controller for active monitoring of the flight information (See section 4.10 of the manual) .

An equivalent level of safety will be achieved by the operator, pursuant to the Manual and Safety Check list, confirming the altitude of the launch site shown on the GPS altitude indicator before flight.

14 CFR 91.151 (a): Fuel requirements for flight in VFR conditions

Section 91.151 (a) outlines fuel requirements for beginning a flight in VFR conditions. Our UAS is limited to operations in sterile and controlled environments as outlined in the Manual, and has a limited range and flight time which require an exemption from 14 CFR 91.151(a).

The battery powering the UAS provides up to approximately 35 minutes of powered flight. To meet the 30 minute reserve requirement in 14 CFR §91.151, UAS flights would be limited to 5 minutes in length. Given the limitations on the UAS's proposed flight area and the location of its proposed operations within a predetermined area, a longer time frame for flight in daylight VFR conditions is reasonable.

Launchit believes that an exemption from 14 CFR §91.151(a) falls within the scope of prior exemptions. See Exemption 10673 (allowing Lockheed Martin Corporation to operate without compliance with FAR 91.151 (a)). Operating the small UAS, in a secure controlled area with less than 30 minutes of reserve fuel, does not engender the type of

risks that Section 91.151(a) was intended to alleviate given the size and speed of the small UAS. Additionally, limiting UAS flights to 5 minutes would greatly reduce the utility for which the exemption will be granted.

An equivalent level of safety can be achieved by limiting flights to 30 minutes, or enough battery reserve to ensure that the UAS lands at the ground station with at least 20% of battery power whichever happens first. The Launchit UAS onboard power management system continuously monitors flight time and amount of battery power. It transmits this information to the PIC at the ground station in real-time. In addition Launchit UAS provides battery failsafe that commands the UA's return to the launch point when critical minimum voltage is reached as prescribed by the PIC.

This restriction would be more than adequate to return the UAS to its planned landing zone from anywhere in its limited operating area. The Launchit UAS Similar exemptions have been granted to other operations, including Exemptions 2689F, 5745, 10673, and 10808.

Pursuant to 14 C.F.R. Part 11, the following summary is provided for publication in the Federal Register, should it be determined that publication is needed:

Applicant seeks an exemption from the following rules: 14 C.F.R. §21, subpart H; 14 C.F.R. §§ 61.113(a) & (b); 91.7(a); 91.9 (b) (2); 91.103(b); 91.109; 91.119(c); 91.121; 91.151(a); 91.203(a) and (b); 91.405 (a); 91.407 (a)(1); 91.409 (a)(1) & (a)(2) and 91.417 (a) & (b) to operate commercially a small unmanned vehicle (15 lb. or less) in its operations.

Approval of exemptions allowing commercial operations of UASs enhances safety while reducing risk. Manned aircraft monitoring and surveying creates a greater risk because the craft are much larger, have combustible fuel, and carry an onboard human pilot. In contrast, a UAS weighing fewer than 15 lb. and powered by batteries eliminates virtually all of that risk given the reduced weight and lack of combustible fuel carried on board. The UAS will carry no passengers or crew and, therefore, will not expose them to the risks associated with manned aircraft flights.

The operation of small UASs, weighting less than 15 lb., conducted in the strict conditions outlined above and in the manual, will provide an equivalent level of safety supporting the grant of the exemptions requested herein, including exempting the applicant from the requirements of Part 21 and allowing commercial operations. These lightweight aircraft operate at slow speeds, close to the ground, and in a sterile environment and, as a result, are far safer than conventional operations conducted with turbine helicopters operating in close proximity to the ground and people.

Privacy

All flights will occur over private or controlled access property with the property owner's prior consent and knowledge. Images taken will be of individuals who have also consented to being filmed or otherwise have agreed to be in the area where aerial photography will take place.

Satisfaction of the criteria provided in Section 333 of the Reform Act of 2012--size, weight, speed, operating capabilities, proximity to airports and populated areas and operation within visual line of sight and national security — provide more than adequate justification for the grant of the requested exemptions allowing commercial operation of applicant's UASs in the telecommunications industry pursuant to the Manual appended hereto.

Sincerely

Sedim Al-Araji

Founder

Launchit Technologies LLC