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FAA
Docket Management Facility
U.S. Department of Transportation
1200 New Jersey Avenue, SE
West Building, Ground Floor, Room W12-140
Washington, DC 20590

Dear Exemption Manager,

We are submitting our Petition for Exemption for Unmanned Aircraft Systems operations. We currently are both experienced UAS pilots with over 1350 combined flight hours and Tom Seidel is An FAA licensed private pilot, since 1982.

Tom is also an active participant in approved FAA training classes for recognized educational hours through the FAA, with whom he is a member.

In addition we did notice, as part of our work on a COA application that a current FAA approved ground school course completion is desired within the last 24 months John is currently completing that requirement again at this time. We take the skills and education for safe operation of UAS, very seriously.

Our request is for a waiver of the sections identified below in an effort to operate a UAS in use of commercial applications for produce field management, Real Estate and Marketing Purposes, Electrical Engineering Inspections and live sporting events.

This request specifically serves the public and economic interest to aide in the areas stated above. The granting of this exemption would make logical sense because of our professional approach to UAS

operations, our clear understanding of FAA rules, our awareness of operational and restricted airspace, our experience as pilots, as well as our ongoing FAA approved educational activities, and our attitude of safety first when it comes to flight operations.

We believe with the granting of this exemption and the additional operational experience we will gain from flight operations that we will be able to have a much larger impact for the future of UAS. More flight experience now will be invaluable for us to assist the general public in the future as they embark into UAS operations.

There is much work to be done in developing the best use of UAS in the public. The coursework and training for best use of the UAS, best operational utilization, best role for the UAS pilot, etc. has yet to be developed in the general public arena. We would like to play a role in that development but we need more operational flight experience with the public to do that. This exemption would allow us to get that real world experience.

We are currently seeking exemption of:
Section of 14 CFR: parts 21 Subpart H, 27, 45.23(b), 45.27(a), 61.113(a) and (b), 61.133(a), 91.7(a), 91.9(b)(2), 91.103, 91.109(a), 91.119, 91.121, 91.151(a), 91.203(a) and (b), 91.319(a)(1), 91.405(a), 91.407(a)(1), 91.409(a)(2), 91.417(a) and (b)
If we have erroneously omitted any other relevant section for our intended operations, please feel Free to suggest the missing section(s).

Suggested Public Federal Register Summary:
"The petitioner is seeking an exemption to operate unmanned aircraft systems (UAS) with a maximum weight of less than three pounds to perform Professional Marketing Services, for Electrical Engineering, Produce Management, Real Estate and Live Sporting Events, Etc. Data gathered may include still and moving images captured with onboard cameras."

UAS Description:
We are asking for an exemption for a UAS up to 3 pounds because we forecast we may be testing and evaluating UAS for the public safety role. These tests would occur in a controlled environment and a flight safe range.

The initial craft we would fly operationally, weighs less than three pounds and would be better qualified as a hovercraft or drone.

In the event a loss of communications occurs the craft will rise up vertically to a safe height before beginning an automatic return to home function. The control signal may be reconnected in flight and the pilot can take over safe operations again if communication is reestablished. However in the case of a GPS failure the craft will be able to be manually flown to a safe landing by the pilot.

The craft operates electrically, carries no flammable fuel, has an integrated GPS pilot system, provides location information along with height AGL, speed, battery life, has programmed no-fly zones for controlled airports, and provides direction of travel and distance from the pilot.

Flight Operations:
We are well aware of conducting safe flight operations and planning flight paths that minimize any overflight of crowds.

Any flight operations in town environments would typically be for close air support for very focused events such as sporting, produce and electrical inspections, or real estate marketing. These operations occur in a very limited area and would not need to overfly densely populated areas in general. Operations would be more vertical in nature above the specific event.

Our proposed public safety UAS operations are typically conducted at low altitudes less than 400 Feet AGL (within Class G airspace), not over crowds, and not near airports. Flights will end when battery reserve reaches 25 percent. Operations will not occur under IFR conditions.

In addition, preflight and post-flight checklists and UAS examinations will help detect any abnormalities prior to flight and after flight. Any UAS unable to satisfy safety checklists will be removed from service until the issue can be resolved. Granting this request would not adversely affect safety since operations would be in accordance with current UAS rules.

Section 333 Compliance and Appropriateness:

Based on the size of the craft, experience of the pilot, and operational goals, this request appears to be well suited for approval using the criteria outlined in Section 333 of the FAA Modernization and Reform Act of 2012 and will move safe flight operations forward in accordance with the intent of Section 333.

Ongoing Efforts:

We are also keenly aware of the new issues involved in UAS public safety operations and would greatly like to assist public safety departments to fly with commonsense and safety first in mind. Many departments I've seen are under the misperception small UAS craft are toys, which they are not. With your help we hope to obtain this exemption in order to use my exempted flight experience to help any agencies get off on the right foot, learn what they don't know, and help them to move forward to operate safer while they utilize the UAS.

Sincerely,

Tom Seidel