

Applicant's Petition for Exemption  
Pursuant to Section 333 of the FAA Modernization and Reform Act of 2012

**Applicant:**

PPL Electric Utilities Corporation,  
Attn: Joel Eline  
2 N. 9<sup>th</sup> Street  
Allentown, PA 18101  
Phone: (610) 774-6088  
Email: [jdeline@pplweb.com](mailto:jdeline@pplweb.com)

**Airspace Consultant of Applicant:**

Clyde J. Pittman  
Director of Engineering  
Federal Airways & Airspace  
1423 S. Patrick Dr.  
Satellite Beach, FL 32937  
Phone: (321) 777-1266

## I. SUMMARY OF PETITION

Pursuant to Section 333 of the FAA Modernization and Reform Act of 2012 (“Section 333”), PPL Electric Utilities (“Applicant”) hereby respectfully requests expedited approval to use Small Unmanned Aircraft System (“sUAS”) under the terms and conditions described in this Petition for Exemption (“Petition”) to conduct inspections of energy infrastructure. PPL Electric Utilities also requests the exemptions that are necessary to such approval pursuant to 49 U.S.C. § 44701(f), and 14 C.F.R. § 11.81.<sup>1</sup>

Applicant seeks to use sUAS to perform visual inspections of vital energy infrastructure, such as transmission and distribution lines and substations, in order to further the public interest in the safe and reliable delivery of electricity to customers. Small UAS are ideally suited for inspection of energy infrastructure—they can safely, inexpensively, and quickly deliver high-quality photo and video, which eliminates the need for physical inspection and thus speeds the process of trouble-shooting, and ultimately increases the reliability of the electric grid. In particular, sUAS allow for safer operations and inspection of the critical infrastructure. Utility workers would be able to conduct inspections without being in close proximity to high-voltage equipment or subject to the height related hazards of bucket trucks or conventional aircraft. They can also facilitate the safe inspection of hard-to-access or environmentally sensitive areas without the use of bucket trucks, helicopters, and other utility vehicles that may have more impact than sUAS. In addition, because of the small size of the craft, there is not the exposure and risk to public safety as with traditional helicopter use. In many cases sUAS can be more efficient and cost effective than traditional methods, which can help to reduce operations and maintenance costs and, perhaps most importantly, provide a means for faster resolution of any problems on the electric system. A reduction to the overall maintenance costs would be of benefit to

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<sup>1</sup> As described in Appendix A to this Petition, Applicant requests an exemption from the following regulations: 14 C.F.R. Part 21; 14 C.F.R. Part 27; 14 C.F.R. §§ 45.23(b); 61.113 (a) and (b); 61.133(a); 91.7(b); 91.9(b)(2); 91.103; 91.109; 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); 91.1501.

the public by being able to pass any reduction of costs directly to the rate payer. The public interest is critical to our success and the approval of this request and the provision of the necessary exemptions will enhance worker and public safety, increase electric system reliability and decrease customer costs.

Moreover, approving the requested use would represent a significant step forward in the Federal Aviation Administration's ("Administration") efforts to integrate sUAS into the national airspace system. PPL Electric Utilities' request provides the Administration with an opportunity to partner with a leading electric energy provider as it works to develop its rulemaking pursuant to the FAA Reauthorization Act of 2012—while doing so for a compelling public purpose and under strict operational and safety guidelines. Given the uniqueness of Applicant—the company has a diverse geographical and environmental footprint and a distinctive resource mix—it is ideally suited to help the Administration understand the potential utility applications for sUAS.

PPL Electric Utilities proposes to use sUAS that are rotorcraft, weigh 15 or fewer pounds, operate at a speed of no more than 50 knots, and contain built-in safety features. In addition, PPL Electric Utilities proposes to use the aircraft at low altitudes, not in proximity to airports or densely populated areas, on property that is owned or controlled by PPL Electric Utilities or is utility right of way, within the visual line of sight of the operator, and under controlled conditions. Accordingly, the requested exemptions satisfy the applicable statutory criteria and policies, will serve the public interest, will not adversely affect safety, and will provide a level of safety at least equal to the existing airworthiness and related regulations. Approval of this Petition is therefore consistent with Section 333's directive to "establish requirements for the safe operation of [unmanned aircraft systems] in the national airspace system" if the Secretary of Transportation determines that certain unmanned aircraft systems may operate safely in the national airspace system.<sup>2</sup>

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<sup>2</sup> Section 333(c) of the FAA Modernization and Reform Act of 2012, Pub. L. No. 112-95, 126 Stat 11.

## II. APPLICANT BACKGROUND

PPL Electric Utilities is a Pennsylvania based utility that services about 1.4 million customers in 29 counties. We maintain more than 48,000 miles of power lines and power over 400 substations in central and eastern Pennsylvania. PPL Electric Utilities is committed, first and foremost to safety. We were the first electric utility company in the country to have all field worksites qualify for “Star” status in the federal Voluntary Protection Program — a status we’ve maintained. The program recognizes companies for going beyond compliance to protect worker health and safety. We believe safety is the cornerstone of every job, every day. Additionally, PPL Electric Utilities is focused on the reliability of its system through maintenance and inspection of the existing electrical system as well as build-out of additional facilities. Consistent with PPL Electric Utilities’ efforts for providing safe and reliable service to our customers, PPL Electric Utilities seeks to use sUAS to more safely and effectively perform inspections of the electrical infrastructure.

## III. RELEVANT STATUTORY AUTHORITY

### A. Section 333

Section 333(a) states that the Administration “shall determine if certain unmanned aircraft system before completion of the plan and rulemaking [to broadly integrate UAS into the national airspace] required by Section 332 of this Act.” Section 333 is also described as a pathway for “expedited operational authorization.”<sup>3</sup>

Section 333(b)(1) outlines the factors that the Administration shall use to determine whether UAS may be operated safely in the national airspace system: size, weight, speed, operational capability, proximity to airports and populated areas, and operation within visual line of sight. In addition, and importantly for this Petition, Section 333(b)(2) provides the Administration with the discretion to

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<sup>3</sup> Section 332(b)(1).

determine that a certificate of waiver, certificate of authorization, or airworthiness certification is not required to operate UAS that are found to be appropriate under Section 333(b)(1). Finally, Section 333(c) allows the Administration to establish requirements for safe operation of the UAS determined to be able to be operated safely in the national airspace system.

**B. Section 44701(f)**

In addition to its specific authority related to authorizing UAS operation under Section 333, the Administration has general authority to grant exemptions from its safety requirements and minimum standards if the Administration finds that the exemption is in the public interest.<sup>4</sup> Administration regulations set forth the information that must be included in the petition for exemption: (1) the applicant's name and mailing address; (2) the regulations from which the applicant seeks exemption; (3) the extent of relief sought and why; (4) the reasons why granting the request would be in the public interest and how it would benefit the public as a whole; and (5) the reasons why granting the exemption would not adversely affect safety, or how the exemption would provide a level of safety at least equal to the rule from which the applicant seeks exemption.<sup>5</sup>

**IV. DISCUSSION**

**A. Applicant's Proposal Satisfies the Section 333 Criteria for Approval.**

As described above, Section 333(b)(1) outlines the factors that the Administration shall use to determine whether UAS may be operated safely in the national airspace system: size, weight, speed, operational capability, proximity to airports and populated areas, and operation within visual line of sight. Applying the criteria outlined in Section 333(b)(1) and other relevant criteria to this case demonstrates that Applicant's proposed terms and conditions of operation will result in the sUAS being operated safely in the national airspace system, consistent with Section 333. Based on the small size of

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<sup>4</sup> 49 U.S.C. § 44701(f).

<sup>5</sup> 14 C.F.R. § 11.81.

the sUASs involved, the low altitude and restricted environment in which they will operate, and the fact that they will be operated within the visual line of sight of the operator, there is more than sufficient basis to find that the sUAS can be operated safely under Applicant's proposal.

**1. Size, Weight, Speed, and Operational Capability**

Applicant proposes to use small, multi-rotor craft with a maximum take-off weight of 15 pounds or less that are powered by electric batteries and carry no flammable fuel or cargo. PPL Electric Utilities anticipates the majority of flights will use much smaller craft—quadcopters with a maximum takeoff weight of five pounds. Heavier craft (up to 15 pounds) will only be used in situations requiring specialized equipment, such as infrared cameras for thermal inspection of power equipment.

The sUAS used by PPL Electric Utilities will have integrated GPS autopilot systems. The integrated GPS autopilots provide stable, precise flight, and stable hovering—enabling field workers to focus on situational awareness (*e.g.*, proximity to high voltage equipment) and safety of themselves and the public. In addition, the GPS autopilot system provides an automatic return to home capability in the unlikely case of signal loss with the operator.

These small, multi-rotor craft are ideally suited for inspection of power lines, generating plants and other power-related infrastructure because they often deliver high-quality photo and video more efficiently and cost effectively than traditional methods. Using sUAS can also be safer for utility workers because it will avoid putting utility workers in close proximity to high-voltage equipment and work conditions with high elevations, eliminating the risk of injuries from falls. They also allow the safe inspection of hard-to-access or environmentally sensitive areas without the use of bucket trucks and other utility vehicles. Overall, sUAS can provide significant benefits over traditional energy infrastructure inspection methods to utility workers and customers.

## **2. Proximity to Airports/Populated Areas**

Applicant will avoid operating the sUAS over densely populated areas and will operate at least three nautical miles away from the nearest public use airport. The sUAS will be operated at low altitudes of 250 feet or less—much lower than the airspace in which manned vehicles operate and lower than the altitude at which hobby aircraft fly. Finally, all operations will occur over utility property or utility right of way.

In addition, PPL Electric Utilities’s flights will likely occur in airspace that is subject to a Notice to Airmen (“NOTAM”). The Administration has issued a standing notice to pilots to avoid loitering in the “airspace above, or in proximity to, sites such as nuclear power plants, power plants, dams, refineries, industrial complexes, military facilities, and other similar facilities.” This NOTAM should further limit the potential interaction of any flights near PPL Electric Utilities power transmission facilities.

## **3. Visual Line of Sight**

A FAA licensed pilot will operate the sUAS during daylight hours, in good weather, and within the operator’s line of sight. In addition, the operator will be accompanied by a trained spotter, who also will be positioned in line of sight of the aircraft and will be in constant communication with the operator to identify and alert the operator to any potential obstacles. This eliminates the need for other “sense and avoid” capabilities during operation, as well as the need for any method of air traffic control communications.<sup>6</sup>

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<sup>6</sup> See *Interim Operational Approval Guidance 08-01, Unmanned Aircraft Systems Operations in the U.S. National Airspace System* at 4 (Mar. 13, 2008).

**B. Applicant's Proposal Also Satisfies the Standard for Exemption under Section 44701 and 14 C.F.R. § 11.81.**

**1. Granting Applicant's Request Would Not Adversely Affect Safety and Would Provide a Level of Safety at Least Equal to Existing Rules.**

Granting PPL Electric Utilities' Petition will not adversely affect safety. Applicant's proposed terms and conditions of operation would provide a level of safety at least equal to existing rules. As discussed above with respect to Section 333(b)(1) criteria, the size, weight, speed, and operational capability of the sUAS that will be used in the proposed operations indicate that the aircraft can be operated safely in the national airspace system. Moreover, the aircraft will be operated at low altitudes, not in proximity to airports or densely populated areas, and within the visual line of sight of the operator and spotter. In addition, PPL Electric Utilities proposes the following conditions to ensure that the requested exemption would result in a level of safety at least equal to the rules from which PPL Electric Utilities is seeking an exemption.

**a. Safety Systems**

Applicant will use sUAS that have a semi-autonomous navigation and control system comprised of a Ground Control Station and "auto-pilot" system. Automated safety functions and safety enhancing features of the sUAS that PPL Electric Utilities will use include the following:

- **Precision Flight and Stable Hovering:** Integrated GPS autopilot system provides position holding, altitude lock, and stable hovering to all field personnel to focus on situational awareness and safely getting the job done.
- **Auto Return-To-Home:** Fail-safe feature will automatically activate in case of signal loss with ground station, using GPS-Enabled autopilot to automatically return and landing the craft at the original take-off point.
- **Clearly Visible Battery and GPS Status:** Battery and GPS Status will be available through airframe status lights clearly visible to the operator and available through the ground station display.
- **No Waypoint Zones:** The Ground Control Station features a function called "No Waypoint Zones." This feature provides an extra element of safety around major airports by not allowing the sUAS to operate within a predetermined radius of these airports.



**b. Mandatory Operating Conditions**

In addition to the safety features described above, PPL Electric Utilities proposes that its exemption be subject to the following mandatory conditions to ensure safe operation:

- Operations will avoid densely populated areas.
- Operations will be conducted over property that is owned or controlled by PPL Electric Utilities or is utility right of way.
- Maximum total flight time for each flight will be 60 minutes. Flights will be terminated at 25% battery power reserve, should that occur before this time limit.
- Operations will occur during Visual Flight Rules Meteorological Conditions.
- Aircraft to remain within Visual Line of Sight (“VLOS”). VLOS will be guaranteed with a cylinder of operation around operator of ½ nautical miles.
- Operations will occur during daylight hours.
- Flights will be operated at an altitude of no more than 250 feet Above Ground Level (“AGL”).
- All operations to remain more than three nautical miles from the airport reference point of public use airports.
- Operators and spotters will meet the operator training and certification requirements proposed below.
- Operators and spotters will be in communication at all times.
- Operator will perform required maintenance per the manufacturer’s recommendations and keep a log of any maintenance performed.
- Operator will perform any safety checks specified in the manufacturer’s user guide prior to each flight.

**c. Operator Training and Certification**

As discussed above, the sUAS PPL Electric Utilities will use are characterized by a high degree of control and built-in technical capabilities that limit the potential for operation outside the operating conditions set forth in this Petition. Moreover, the mandatory operating conditions (maximum altitude, proximity to airfields, visual line of sight) minimize any potential weather impact and interactions with other aircraft.

Situational awareness around high-voltage equipment, a thorough working knowledge of the sUAS, and strict adherence to corporate sUAS flight policy are key to safe sUAS operations. Given the significant differences between sUAS and piloted aircraft, the safety features inherent in the sUAS, and the strict operating conditions that will apply, PPL Electric Utilities proposes that, in addition to holding a commercial or private pilot license, operators of the sUAS shall also be required to have:

- Proven knowledge of PPL Electric Utilities UAS flight policy (including Mandatory Operating Conditions specified in this Petition);
- Proven working knowledge of safe sUAS operations, flight characteristics, safety features, GPS/Battery Status indicators, and emergency procedures;
- Utility knowledge regarding safe operations around high voltage power lines, substation equipment, and power plants; and
- A valid driver's license.

Applicant is receptive to future regulations and industry guidance on licensing sUAS pilots using training and testing that is relevant to operating sUAS in a limited flight area.

**d. Privacy Considerations**

Applicant will not operate sUAS in any way that may invade personal privacy and will comply with any federal, state, or local privacy laws that may apply in areas where PPL Electric Utilities operates sUAS. In addition, as a practical matter, flights will occur over utility property or utility right of way, so privacy is unlikely to be a concern in relation to Applicant's proposed use.

**2. Granting Applicant's Request Would Be in the Public Interest and Would Benefit the Public as a Whole.**

Allowing the requested use will provide significant benefits to the public, PPL Electric Utilities customers, and PPL Electric Utilities employees. Using sUAS to inspect energy infrastructure can be safer and more efficient than traditional methods of infrastructure inspection, such as the use of

helicopters and bucket trucks. The increased safety and efficiency of using sUAS to inspect infrastructure following significant weather events is especially important to PPL Electric Utilities, which serves 1.4 million customers in Pennsylvania, where storms occur with frequency. An infrastructure inspection process that is safer and more efficient can help to lower operations and maintenance costs and more quickly resolve problems in the delivery of electricity, both of which will benefit customers.

Moreover, the requested use presents a compelling case for the Administration moving forward with efforts to integrate sUAS into the national airspace system as required by Section 333. The public has a significant interest in efficient and safe inspection of energy infrastructure to ensure reliable delivery of power, and PPL Electric Utilities has proposed using sUAS to further this public interest in a way that is at least as safe as operation of aircraft under existing regulations. Applicant's request, therefore, provides the Administration an appropriate vehicle to further Congress' mandate to expedite integration of UAS. In addition, Applicant's operational experience resulting from the use of sUAS in utility operations may be valuable to the Administration in developing comprehensive rules governing sUAS for the electric industry.

#### **C. Description of Relief Sought and Regulations from Which Exemption is Requested**

Based on the foregoing, Applicant's proposal satisfies the criteria for approval under Section 333. In addition, Applicant's proposal meets the requirements and policies for exemptions from Administration regulations. PPL Electric Utilities therefore respectfully requests that the Administration grant exemptions from the regulations set forth in Appendix A to this Petition.<sup>7</sup>

### **V. CONCLUSION**

For the reasons discussed above, PPL Electric Utilities satisfies the relevant criteria for approval under Section 333 and exemptions from referenced regulations pursuant to Section 44701(f).

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<sup>7</sup> Applicant has attempted to identify the applicable regulations for which an exemption is required for the proposed use. To the extent that the Administration determines that any other safety regulations might apply to Applicant's proposed use, Applicant further requests that this Petition be deemed to seek an exemption from those requirements.

Accordingly, PPL Electric Utilities respectfully requests that the Administration grant the relief requested in this Petition to allow the use of sUAS for the purposes and under the conditions set forth herein.

Granting this Petition will not only further Congress' instruction to expedite the safe integration of UAS into the national airspace system, but will also further the significant public interest in the safe and reliable delivery of electricity to customers.

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Respectfully submitted,

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Clyde J. Pittman  
Director of Engineering  
Federal Airways & Airspace  
1423 S. Patrick Dr.  
Satellite Beach, FL 32937  
Phone: (321) 777-1266

## **Appendix A: Regulations from Which Exemption is Requested**

Applicant has attempted to identify the applicable regulations for which an exemption is required for the proposed use. To the extent that the Administration determines that any other safety regulations might apply to Applicant's proposed use, PPL Electric Utilities further requests that this Petition be deemed to seek an exemption from those requirements.

### **1. 14 C.F.R. Part 21: Airworthiness Certification**

Part 21 establishes procedural requirements for certifications under Section 44704, including airworthiness certificates. Both Sections 333 and 44701(b) authorize the Administration to exempt aircraft from airworthiness certification under this Part based upon consideration of its size, weight, speed, operational capability, and proximity to airports and populated areas. See Section 333.

An analysis of these criteria demonstrates that the sUAS 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 operating with an airworthiness certificate without the restrictions and conditions proposed.

The sUASs PPL Electric Utilities will use are 15 pounds or less, carry no pilot or passengers, and carry no explosive materials or flammable liquid fuels. Operations under this exemption will be tightly controlled and monitored by the operator and spotter. These safety enhancements provide at least the same degree of safety to the public and property owners than conventional operations conducted with airworthiness certificates.

### **2. 14 C.F.R. Part 27: Airworthiness Standards for Normal Category Rotorcraft**

Part 27 sets forth the procedural requirements for airworthiness certification of normal category rotorcraft. To the extent the sUAS would otherwise require certification under Part 27, as a rotorcraft, PPL Electric Utilities requests an exemption from Part 27's airworthiness standards for the same reasons identified above with respect to Part 21 requirements.

**3. 14 C.F.R. § 45.23(b): Marking Requirements**

Section 45.23(b) requires that on limited, restricted, or light-sport category aircraft, or experimental or provisionally certificated aircraft, markings indicating the aircraft category must be displayed in letters not less than two inches nor more than six inches high “near each entrance to the cabin, cockpit, or pilot station.” Exemption from 14 C.F.R. § 45.23(b) is warranted because the aircraft has no entrance to the cabin, cockpit, or pilot station on which the required marking can be displayed. PPL Electric Utilities requests an exemption to 14 C.F.R. § 45.23(b)’s marking requirements and proposes instead to display markings to the fullest extent possible in compliance with the location requirements of 14 C.F.R. § 45.27(a) and the size requirements of 14 C.F.R. § 45.29(f).

**4. 14 C.F.R. §§ 61.113(a) and (b); 61.133(a): Private Pilot Privileges and Limitations: Pilot in Command; Commercial Pilot Privileges and Limitations**

Sections 61.113(a) and (b) limit private pilots to non-commercial operations. Section 61.133(a) requires an individual with a commercial pilot’s license to be pilot in command of an aircraft for compensation or hire. Unlike a conventional aircraft that carries a pilot, passengers, and cargo, the sUAS proposed for use by PPL Electric Utilities are remotely controlled with no passengers or cargo on board.

Applicant respectfully requests exemptions from these requirements based on the particular characteristics of the sUAS that will be used. The risks associated with the operation of the sUAS described above (given the size, speed, operational capabilities, and lack of combustible fuel) are much lower than the risks associated with private pilot operations or commercial operations contemplated by Part 61 with conventional aircraft. Given the inherently lower-risk nature of the sUAS and these safety features, PPL Electric Utilities proposes that operators be required to successfully complete the training described above. This training and the conditions and restrictions on operation proposed in this Petition will provide an equivalent level of safety as requiring operators to have a private pilot’s certificate or a commercial pilot’s certificate.

**5. 14 C.F.R. § 91.7(a): Civil Aircraft Worthiness**

Section 91.7(a) requires that no person may operate a civil aircraft unless it is in airworthy condition. If the Administration grants Applicant's request for exemption from the requirement to obtain an airworthiness certificate, no Administration regulatory standard will exist for determining airworthiness. PPL Electric Utilities will, however, maintain the sUASs as directed by the manufacturers and conduct any recommended safety checks prior to each flight.

**6. 14 C.F.R. § 91.9(b)(2): Civil Aircraft Flight Manual in the Aircraft**

Section 91.9(b)(2) prohibits a person from operating a civil aircraft "[f]or which an Airplane or Rotorcraft Flight Manual is not required by § 21.5 of this chapter, unless there is available in the aircraft a current approved Airplane or Rotorcraft Flight Manual, approved manual material, markings, and placards, or any combination thereof."

Given the size and configuration of the sUASs PPL Electric Utilities will use, it is not possible to carry such a flight manual on the aircraft. The equivalent level of safety will be achieved by keeping the flight manual (specifically, the manufacturer's user guide) at the ground control point where the operator will have immediate access to it.

**7. 14 C.F.R. § 91.103: Preflight Action**

Section 91.103 requires a pilot in command to become familiar with specific information before each flight, including information contained in the Administration-approved Flight Manual on board the aircraft. As no Administration-approved Flight Manual will be provided, PPL Electric Utilities requests an exemption from this requirement. The operator would, however, become familiar with the manufacturer's user guide.

**8. 14 C.F.R. §§ 91.109, 91.319(a)(1): Flight Instruction**

These regulations provide 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.

The sUASs PPL Electric Utilities will use are remotely-piloted aircraft and designed without fully functioning dual controls. Flight control is accomplished through the use of a control box that communicates with the aircraft via radio communications. The equivalent level of safety provided by the fact that neither a pilot nor passengers will be carried in the aircraft, by the size and speed of the aircraft, and the safety features of the aircraft that limit the potential for operation outside the operating conditions set forth in this Petition.

**9. 14 C.F.R. § 91.119: Minimum Safe Altitudes**

Section 91.119(c) prescribes the minimum safe altitudes under which aircraft may not operate, including 500 feet above the surface and away from any person, vessel, vehicle, or structure in non-congested areas. Section 91.119(d)(1) allows for a helicopter to operate at less than those minimum altitudes under certain conditions.

As described above, PPL Electric Utilities will operate the sUAS at altitudes up to 250 feet AGL, and therefore requests an exemption from the 500-foot minimum altitude. Given the size, weight, and speed of the sUAS and the lack of flammable fuel, any risk associated with these operations is far less than those presently presented with conventional aircraft operating at or below 500 AGL. In addition, the low-altitude operations of the sUAS will ensure separation between these sUAS operations and the operations of conventional aircraft that must generally operate above 500 feet.

**10. 14 C.F.R. § 91.121: Altimeter Settings**

Section 121 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 sUAS may not have a barometric altimeter, but instead use GPS technology, PPL Electric Utilities requests an exemption from this requirement to the extent it operates sUAS without a barometric altimeter. An equivalent level of safety will be achieved by the operator confirming the acquisition of GPS signals and an initial ground level altitude of zero prior to take off.



**11. 14 C.F.R. § 91.151(a): Fuel Requirements for Flight in VFR Conditions**

Section 91.151(a) prohibits an individual from beginning “a flight in an airplane under VFR conditions unless (considering wind and forecast weather conditions) there is enough fuel to fly to the first point of intended landing, and, assuming normal cruising speed – (1) During the day, to fly after that for at least 30 minutes; or (2) At night, to fly after that for at least 45 minutes.”

Applicant requests an exemption from the 30 minutes of reserve fuel requirement. Given the limitations on flight locations and operations set forth in this Petition, a longer time frame for flight is reasonable. Operating the sUAS in a tightly 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 sUAS.

Applicant proposes that an equivalent level of safety can be achieved by limiting flights to 60 minutes or 25% of battery power, whichever happens first. This restriction would be more than adequate to return the sUAS to its planned landing zone from anywhere in its limited operating area.

**12. 14 C.F.R. § 91.203(a) and (b): Carrying Civil Aircraft Certification and Registration**

Section 91.203 requires a civil aircraft to have “within it . . . [a]n appropriate and current airworthiness certificate” that must be “displayed at the cabin or cockpit entrance so that it is legible to passengers or crew.” As discussed above with respect to Section 91.9(b)(2) requiring the aircraft to carry a flight manual, the physical characteristics of sUAS are such that there is no ability or place to carry registration documents or to display them on the sUAS. An equivalent level of safety will be achieved by keeping registration documents at the ground control point where the operator will have immediate access to them. Moreover, the requirement to carry airworthiness certificate will not apply to PPL Electric Utilities if the Administration grants Applicant’s request for an exemption from this requirement, as requested above.

**13. 14 C.F.R. §§ 91.405(a); 91.407(a)(1); 91.409(a)(2); 91.417(a) and (b): Maintenance Inspections**

These regulations specify maintenance and inspection standards in reference to 14 C.F.R. Part 43. Specifically, 14 C.F.R. § 91.405(a) states that the owner or operator of an aircraft shall have the aircraft inspected as prescribed in the rules and have discrepancies repaired as prescribed in part 43; 14 C.F.R. §§ 407(a)(1) and 409(a)(2) requires that an aircraft be approved for return to service by a person authorized under 14 C.F.R. Section 43.7 after it has undergone maintenance or receives an annual inspection; and 14 C.F.R. § 417 requires an owner or operator of an aircraft to maintain specific types of maintenance records, including signatures of the person authorized to approve the aircraft's return to service.

Given that these sections and Part 43 apply only to aircraft with an airworthiness certificate, these sections will not apply to Applicant's operation of sUAS. Maintenance will be accomplished by the operator pursuant to the manufacturer specifications. An equivalent level of safety to existing regulations will be achieved because these sUASs are very limited in size, operate only in restricted areas for limited periods of time, and carry no flammable fuel. If mechanical issues arise, the sUAS can land immediately and will be operating from no higher than 250 feet AGL. As described above, the operator will ensure that the sUAS is in working order prior to initiating flight, perform a preflight safety checklist, perform required maintenance, and keep a log of any maintenance performed. Moreover, the operator is the person most familiar with the aircraft and best suited to maintain the aircraft in an airworthy condition to provide the equivalent level of safety.

**14. 14 C.F.R. § 91.1501: Continued Airworthiness**

Section 91.1501(a) "requires operators to support the continued airworthiness of each airplane." PPL Electric Utilities requests an exemption from this regulation because the sUAS will not be subject to an airworthiness certificate.

## **Appendix B: Summary Suitable for Publication in the Federal Register**

Applicant petitions the Federal Aviation Administration for relief from compliance with 14 C.F.R. Part 21; 14 C.F.R. Part 27; 14 C.F.R. §§ 45.23(b); 61.113 (a) and (b); 61.133(a); 91.7(a); 91.9(b)(2); 91.103; 91.109; 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); 91.1501 for purposes of operating small unmanned aircraft 15 pounds or less on property that is owned or controlled by PPL Electric Utilities or in utility right of way to inspect energy infrastructure and identify problems in the delivery of electricity to customers. PPL Electric Utilities proposes that its operation be subject to the operating conditions and safety standards set forth in the petition in lieu of the above-referenced regulations in order to provide a level of safety equivalent to those regulations.