

From: [Attebury, John H \(FAA\)](#)
To: contact@aerialimagingtechnology.com
Cc: [Troutman, Jake \(FAA\)](#)
Subject: Request for Information, Aerial Imaging Technology, Docket FAA-2020-1012
Date: Friday, April 02, 2021 1:08:00 PM

David Fields
Aerial Imaging Technology
P.O. Box 3144
Rocklin, CA 95677

Dear David Fields:

This email is to inform you that the following information is required to continue processing your petition for exemption for Aerial Imaging Technology, Docket FAA-2020-1012. We request you provide the following information to us no later than May 7, 2021:

1. In your petition, you state “We also ask for exemption from all necessary parts (outlined below) of part 137 to allow us to use the UAS to spray organic pesticides/economic poisons ...” Please specify exactly which 14 CFR part 137 regulations you seek relief from, and provide an equivalent level of safety. For your reference, we have granted similar relief in Exemption No. 18009 to Powers Flight Group.

2. Additionally, in similar grants of exemption which provide relief to operate large UAS for agricultural aircraft operations, the petitioners have provided proprietary documents in support of their petition. These typically include:

- Training Program
- Flight Operations and Procedures Manual
- Operational Risk and Safety Manual

Please provide similar documents that provide an equivalent level of safety.

3. Finally, in your petition, you state: “For extra operational safety; in all UAS we will integrate an auto-deploying parachute system, to mitigate risk should a motor fail or some other critical flight component fail, rendering the UAV unable to land safely. This parachute system will auto-deploy and is triggered by one of the following; abnormal decent rate, abnormal yaw rate, abnormal pitch rate, abnormal roll rate, or manual trigger release which can be deployed instantly by the PIC or VO.” Please provide detailed information on this parachute system. To our knowledge, the DJI Agras T16 UAS is not equipped with a parachute system.

The requested information listed above should be in sufficient detail to enable the FAA to conduct a thorough risk-based evaluation of your proposed operation in order to determine that the operation can be safely conducted.

Please submit the additional information (non-proprietary) as a comment to your docket at www.regulations.gov, and save the tracking number generated after submission. Proprietary information may be submitted electronically to Jake Troutman and John Attebury at

Jake.troutman@faa.gov and John.h.Attebury@faa.gov, respectively.

If you want us to process your request any further, we must receive the information described above by May 7, 2021. If we do not receive the information, we will close the docket without notifying you further. If you have any questions or require additional time you may email us or call 281-443-5862.

Sincerely,

John H. Attebury
Safety Standards
General Aviation and Commercial Division
Commercial Operations Branch (AFS-820)
(281) 443-5862 office
john.h.attebury@faa.gov
(Remotely Sited - Houston, Texas)

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