



U.S. Department
of Transportation
**Federal Aviation
Administration**

800 Independence Ave., S.W.
Washington, D.C. 20591

August 24, 2015

Exemption No. 11494A
Regulatory Docket No. FAA-2015-0304

Ms. Carol Gosain
Counsel for The Travelers Companies, Inc.
Steptoe & Johnson LLP
1330 Connecticut Avenue, NW.
Washington, D.C. 20036

Dear Ms. Gosain:

This letter is to inform you that we have granted your petition for an amendment. It explains the basis for our decision, describes its effect, and lists any changes to the original conditions and limitations.

By letters dated June 15 and July 23, 2015, you petitioned the Federal Aviation Administration (FAA) on behalf of The Travelers Companies, Inc. (hereinafter petitioner or operator) for an amendment to your current exemption. That exemption from §§ 61.23(a) and (c), 61.101(e)(4) and (5), 61.113(a), 61.315(a), 91.7(a), 91.119(c), 91.121, 91.151(a)(1), 91.405(a), 91.407(a)(1), 91.409(a)(1) and (2), and 91.417(a) and (b) of Title 14, Code of Federal Regulations (14 CFR) allows the petitioner to operate a UAS to perform aerial data collection. You requested an amendment to add the DJI Phantom 3 and 3D Robotics Solo aircrafts.

In your petition, you indicate that there has been no change in the conditions and reasons relative to public interest and safety that were the basis for granting the original exemption.

The FAA has determined that good cause exists for not publishing a summary of the petition in the Federal Register because the requested amendment to the exemption would not set a precedent, and any delay in acting on this petition would be detrimental to the petitioner. The unmanned aircraft authorized in the original grant are comparable in type, size, weight, speed and operating capabilities to those in this petition.

Airworthiness Certification

In accordance with the statutory criteria provided in Section 333 of Public Law 112-95 in reference to 49 U.S.C. § 44704, and in consideration of the size, weight, speed, and limited

operating area associated with the aircraft and its operation, the Secretary of Transportation has determined that this aircraft meets the conditions of Section 333. Therefore, the FAA finds that relief from 14 CFR part 21, *Certification procedures for products and parts, Subpart H—Airworthiness Certificates*, and any associated noise certification and testing requirements of part 36, is not necessary.

Our Decision

The FAA has determined that the justification for the issuance of Exemption No. 11494 remains valid and is in the public interest. Therefore, under the authority contained in 49 U.S.C. 106(f), 40113, and 44701, delegated to me by the Administrator, the operator is granted an amendment to add new aircraft to its UAS operations.

The operator shall add this amendment to its original exemption.

Conditions and Limitations

All conditions and limitations within Grant of Exemption No. 11494 remain in effect except as follows. Condition No. 1 has been updated to reflect the additional aircraft.

Failure to comply with any of the conditions and limitations of this grant of exemption will be grounds for the immediate suspension or rescission of this exemption.

1. Operations authorized by this grant of exemption are limited to the 3DRobotics IRIS+, DJI Phantom 2, DJI Phantom 3, and 3D Robotics Solo when weighing less than 55 pounds including payload. Proposed operations of any other aircraft will require a new petition or a petition to amend this exemption.

This exemption terminates on May 31, 2017, unless sooner superseded or rescinded.

Sincerely,

/s/

John S. Duncan

Director, Flight Standards Service



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June 15, 2015

U.S. Department of Transportation
1200 New Jersey Avenue, S.E.
Room W12-140
Washington, D.C. 20590

**Re: The Travelers Companies, Inc. Request to Amend
Exemption No. 11490, Docket No. FAA-2015-0307
Exemption No. 11494, Docket No. FAA-2015-0304**

Dear Sir or Madam:

On May 5, 2015, the Federal Aviation Administration ("FAA") granted to The Travelers Companies, Inc. ("Travelers") Exemption Nos. 11490 and 11494 (the "Exemptions") in Docket Nos. FAA-2015-0307 and FAA-2015-0304, respectively. The Exemptions allow Travelers to operate certain small unmanned aircraft systems ("UAS") to perform aerial data collection. Travelers hereby respectfully requests an amendment to each of the Exemptions to allow Travelers to operate an additional type of small UAS under the same conditions and limitations set forth in the Exemptions.

In addition to the two types of small UAS already authorized by the Exemptions (i.e., DJI Phantom 2 and 3D Robotics IRIS+ aircraft), Travelers wishes to amend the Exemptions to also allow Travelers to operate the 3D Robotics Solo aircraft. The 3DR Solo is a small (micro) UAS; it weighs 3.3 pounds (1.5 kg.) without payload and 3.9 pounds (1.8 kg.) with payload (camera and gimbal). It is 10 inches tall and 18 inches wide. Its maximum speed is 55 miles per hour, well within the prescribed limitation of 100 miles per hour. Its range is roughly 0.5 miles, and its maximum flight time is about 20 minutes. Like the small UAS that Travelers is already permitted to operate, the 3DR Solo has geo-fencing and flight programming capabilities and a flight termination system. If the UAS loses communications or its GPS signal, it will return to a pre-determined location within the planned operating area and land or be recovered in accordance with Travelers' Unmanned Aircraft System Operating Procedures, Safety Code and Training Syllabus ("Manual").

Travelers' Manual is already on file with FAA; it was submitted confidentially with Travelers' original petitions in the above-referenced dockets. The manufacturer's user manual and preflight checklist for the 3DR Solo are available at: <http://3drobotics.com/wp-content/uploads/2015/06/DraftB.pdf>. Travelers will operate the 3DR Solo in accordance with its Manual (as revised from time to time) and the manufacturer's manual and checklist.

Travelers respectfully submits that good cause exists for not publishing a summary of this request in the Federal Register and for granting the requested amendments expeditiously. Travelers asks only to amend its existing Exemptions to add another type of small UAS. Its request would not set any precedent, and any delay in acting on the request would harm Travelers, which intends to begin conducting operations using the 3DR Solo as soon as possible after the requested amendments are approved.

Please do not hesitate to contact Travelers' outside counsel, Carol Gosain, with any questions about this filing.

Sincerely,

Carol Gosain

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July 23, 2015

U.S. Department of Transportation
1200 New Jersey Avenue, S.E.
Room W12-140
Washington, D.C. 20590

**Re: The Travelers Companies, Inc. Request to Amend
Exemption No. 11490, Docket No. FAA-2015-0307
Exemption No. 11494, Docket No. FAA-2015-0304**

Dear Sir or Madam:

On May 5, 2015, the Federal Aviation Administration ("FAA") granted to The Travelers Companies, Inc. ("Travelers") Exemption Nos. 11490 and 11494 (the "Exemptions") in Docket Nos. FAA-2015-0307 and FAA-2015-0304 (the "Exemptions Dockets"), respectively. The Exemptions allow Travelers to operate certain small unmanned aircraft systems ("UAS") to perform aerial data collection. Travelers hereby respectfully requests an amendment to each of the Exemptions to allow Travelers to operate additional types of small UAS under the same conditions and limitations set forth in the Exemptions.

Travelers wishes to amend the Exemptions to allow Travelers to operate the DJI Phantom 3 Professional and DJI Phantom 3 Advanced (together, "DJI Phantom 3"), as well as any other types of "micro" unmanned aircraft, as that term is defined in the Small UAS Proposed Rule, i.e., UAS that weigh no more than 4.4 pounds.¹ The DJI Phantom 3 weighs about 2.8 pounds. Its

¹ Travelers is already authorized by the Exemptions to operate two types of small UAS – i.e., the DJI Phantom 2 and 3D Robotics IRIS+ aircraft – and it has a pending request in the Exemptions Dockets for authority to operate the 3D Robotics Solo aircraft, also a small UAS. The size, weight and performance specifications of the DJI Phantom 3 are substantially similar to those of the DJI Phantom 2. Each of the DJI Phantom 2, 3D Robotics IRIS+, 3D Robotics Solo and DJI Phantom 3 weighs less than 4.4 pounds and thus would be considered "micro" under FAA's proposed micro classification in the Small UAS Proposed Rule. *See Operation and Certification of Small Unmanned Aircraft Systems*, 80 Fed. Reg. 9544 (Feb. 23, 2015). Travelers requests herein not only authority to operate the DJI Phantom 3, but also authority to operate any other types of small UAS that would be classified as micro under the proposed rule.

diagonal size (including propellers) is about 23 inches. Its maximum speed is 38 miles per hour, well within the prescribed limitation of 100 miles per hour. Its maximum range is roughly 1.2 miles, and its maximum flight time is about 23 minutes. Like the UAS that Travelers is already permitted to operate, the DJI Phantom 3 has geo-fencing and flight programming capabilities and a flight termination system. If the UAS loses communications or its GPS signal, it will return to a pre-determined location within the planned operating area and land or be recovered in accordance with the Travelers' Unmanned Aircraft System Operating Procedures, Safety Code and Training Syllabus ("Manual").

Travelers' Manual is already on file with FAA; it was submitted confidentially with Travelers' original petitions in the Exemptions Dockets. The manufacturer's user manuals, quick start manuals and safety guidelines for the DJI Phantom 3 are available at: <http://www.dji.com/product/phantom-3/download>. Travelers will operate the DJI Phantom 3 and all other small UAS that it is authorized to operate in accordance with its Manual (as revised from time to time) and the manufacturers' manuals.

Travelers respectfully submits that good cause exists for not publishing a summary of this request in the Federal Register and for granting the requested amendments expeditiously. Travelers asks only to amend its existing Exemptions to add other types of micro UAS, i.e., the DJI Phantom 3 and other "micro" unmanned aircraft, as that term is defined in the Small UAS Proposed Rule. Its request would not set any precedent, and any delay in acting on the request would harm Travelers, which intends to conduct operations using new types of micro UAS as soon as possible after the requested amendments are approved.

Please do not hesitate to contact Travelers' outside counsel, Carol Gosain, with any questions about this filing.

Sincerely,

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