



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

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

July 20, 2015

Exemption No. 11274A
Regulatory Docket No. FAA-2014-0796

Ms. Kathleen Swain
Innovation Adviser
United Services Automobile Association
9800 Fredericksburg Road
San Antonio, TX 78288

Dear Ms. Swain:

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 letter dated May 13, 2015, you petitioned the Federal Aviation Administration (FAA) on behalf of United Services Automobile Association (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 Aerialtronics Zenith, 3DR Iris +, DJI Phantom 2 Vision, DJI Inspire 1, DJI S900, 3DR Spektre, 3DR Solo, DJI Phantom 3, and E-Flite Apprentice.

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. 11274 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. 11274 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 PrecisionHawk Lancaster, Aerialtronics Zenith, 3DR Iris +, DJI Phantom 2 Vision, DJI Inspire 1, DJI S900, 3DR Spektre, 3DR Solo, DJI Phantom 3, and E-Flite Apprentice 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 April 30, 2017, unless sooner superseded or rescinded.

Sincerely,

/s/

John S. Duncan

Director, Flight Standards Service

Enclosures



U.S. Department of Transportation
Docket Management System
1200 New Jersey Avenue, SE
Washington, DC 20590

May 13, 2015

Reference: Amendment to United Services Automobile Association's Exemption No. 11274 and 11309 in Regulatory Dockets FAA-2014-0796 and FAA-2014-0964 to include additional UAS (Unmanned Aircraft Systems).

Dear Sir or Madam,

United Services Automobile Association (USAA) was issued two exemptions, no. 11274 and 11309 (hereinafter referred to as the exemptions) for operation in the national airspace. USAA, hereby requests an amendment to the exemptions to allow additional Unmanned Aircraft Systems (UAS) with no changes in the conditions and reasons relative to public interest and safety that were the basis for the FAA granting the original exemptions.

USAA wishes to operate the following additional UAS:

- Aerialtronics Zenith with integrated Airware system (already approved by the FAA in prior exemption no. 11188)
- 3DR Iris+ (already approved by the FAA in prior exemption no. 11490)
- DJI Phantom 2 Vision (already approved by the FAA in prior exemption no. 11479)
- DJI Inspire 1 (already approved by the FAA in prior exemption no. 11153A)
- DJI S900 (already approved by the FAA in prior exemption no. 11471)
- 3DR Spektre (already approved by FAA in prior exemption no. 11206)
- 3DR Solo
- DJI Phantom 3
- E-Flite Apprentice (for training purposes only)
- Drone Deploy system on our exemption no. 11274 and 11309 approved PrecisionHawk Lancaster UAS

under the same terms and conditions contained in the previously granted exemptions. Attached and submitted as confidential documents in a separate e-mail, are the flight operation manuals for the additional UAS. All operations of the additional UAS will be in full compliance with the terms of the exemptions.

As this is an amendment to existing exemptions requesting only the addition of other types of UAS, USAA respectfully submits that good cause exists so that notice does not need to be published in the Federal Register for the requested amendment.

9800 Fredericksburg Road
San Antonio, Texas 78288



Please contact the undersigned should you have any questions concerning this request for an amendment to the exemptions.

Sincerely,

Kat Swain

Kathleen "Kat" Swain
Innovation Advisor
CFI, MEI, AGI
USAA