



MOTION PICTURE ASSOCIATION  
OF AMERICA, INC.  
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July 16, 2014

Docket Management Facility  
Docket Number FAA-2014-0352  
U.S. Department of Transportation  
1200 New Jersey Avenue, SE  
West Building Ground Floor, Room W12-140  
Washington, DC 20590

**RE: Comments of the Motion Picture Association of America, Inc. on Docket Number FAA-2014-0352, “Exemption to Operate Commercially a Small Unmanned Vehicle (55lbs or less) in Motion Picture and Television Operations.”**

To Whom It May Concern:

The MPAA supports the Federal Aviation Administration’s efforts to incorporate small Unmanned Aerial Systems (sUAS) into the national airspace in a safe and controlled manner. The MPAA also supports the petitions by Astraeus Aerial, and similar operators, that have asked the FAA for an exemption to operate sUAS in scripted motion picture and television productions. Permitting the use of sUAS would allow for creative aerial shots and provide a safer option for shooting scenes.

Founded in 1922, the MPAA is a trade association that advocates for the domestic motion picture, home video, and television industries. Its members are Paramount Pictures Corp., Sony Pictures Entertainment Inc., Twentieth Century Fox Film Corp., Universal City Studios LLC, Walt Disney Studios Motion Pictures, and Warner Bros. Entertainment Inc.

The safety of the men and women who work tirelessly to create our film and television content is of paramount concern. For this reason, the operators who filed the petitions developed safety guidelines and operational procedures for scripted film and television production that will ensure this technology can be deployed in a controlled and safe environment. The MPAA supports the operators’ clearly defined guidelines, which limit the use of this technology to systems weighing less than 55 pounds and operated within line of sight at an altitude of no more than 400 feet above ground level. As filming is performed on closed sets, mandatory safety briefings and instructions will be easy to convey and implement, and the sUAS will not be in close proximity to the public. sUAS also do not carry explosive materials or flammable fuel liquids, unlike manned helicopters.

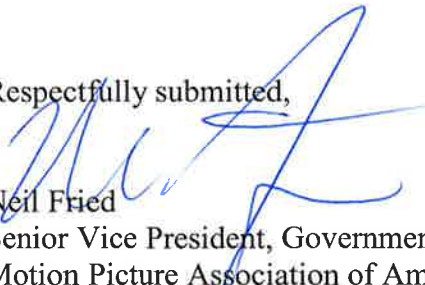
Because sUAS can fly safely at low altitudes that would otherwise be difficult for a manned helicopter, the use of sUAS in both scripted and unscripted motion pictures and television would allow for creative aerial shots, engaging audiences in new and innovative ways.

Whether through shots winding in between bridges or above rooftops, aerial videography pulls the viewers into the action. Internationally, filming with sUAS has been used frequently with much success.

The MPAA fully supports the operators' request under Section 333 of the FAA Modernization and Reform Act of 2012, and respectfully urges the FAA to approve the exemption to allow the commercial use of sUAS in motion picture and television operations. The MPAA appreciates the opportunity to provide our views and would be pleased to provide any additional information the Department may request.

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Respectfully submitted,



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