

21 April 2015
Reference: F0002296

Dear XXXX

I am writing in respect of your recent request of 24 March 2015 for the release of information held by the Civil Aviation Authority (CAA).

Your request:

I am seeking information regarding the test operation of Amazon UAS in the UK. Amazon has announced that is working on delivery drones under the name Prime Air, and that these are being developed in the UK.

I would like copies of communications between Amazon and the CAA regarding its UAS operations, details of the vehicles they are testing, locations and details of operation, and any restrictions or conditions the CAA applied.

Our response:

Having considered your request in line with the provisions of the Freedom of Information Act 2000 (FOIA), we are able to provide the information below.

The specific communications that have taken place are provided in attachment 1. As you will see, these messages are chiefly concerned with the setting up of some initial meetings with the CAA to discuss the Amazon Prime Air project and the potential for operation within the UK.

We have redacted some personal data from these emails in accordance with Section 40(2) of the FOIA as to release the information would be unfair to the individuals concerned and would therefore contravene the first data protection principle that personal data shall be processed fairly and lawfully. A copy of this exemption can be found below.

Two face-to-face meetings were held between Amazon and CAA staff in July 2014. The first meeting was essentially a high level introduction at senior management level, aimed at providing the CAA with a general overview of the project and to discuss the potential for development of the programme within the UK. The second meeting was a more operational and airworthiness related meeting during which the Amazon team provided an outline of their overall intentions, but it was primarily a 'one way' flow of information with the CAA team providing advice and information regarding the UK's UAS policy, regulations and the steps that would need to be followed in order for the project to become fully operational.

Civil Aviation Authority

Aviation House Gatwick Airport South Gatwick RH6 0YR www.caa.co.uk

Telephone 01293 768512 foi.requests@caa.co.uk

The principles and processes that were discussed are as contained within CAA Publication CAP722, the CAA's UAS guidance document (www.caa.co.uk/cap722). The first steps of the project involve the initial development of a test aircraft, which has a mass of less than 20kg and is flown within the visual line of sight of the person flying it – it was established that these flights could be conducted wholly in accordance with the specific small unmanned aircraft regulations contained within the UK Air Navigation Order 2009 (see attachment 2) and hence no further operational or technical approvals were required at that time. Some additional advice was provided with regard to the UK's airspace structure and restrictions in order to assist the Amazon team in selecting an appropriate test site. The meeting ended with the Amazon team at a point where they would research and select a suitable testing site and then commence the first phase of testing operations which would be flown in accordance with Articles 166 and 167; it was also agreed that they would resume contact with the CAA once their technical development and testing requirements had reached the stage where a more specific flight approval would be required. This is the stage that we are currently at – we are aware that Amazon has established an operating site in the Cambridge area and that it has commenced initial test flights but, due to the nature of the flights, we have no requirement for any further oversight at this time and hence have no details of the system that is being tested.

For further details of the specifics of Amazon's current and intended operations, we would suggest that you approach the company directly.

If you are not satisfied with how we have dealt with your request in the first instance you should approach the CAA in writing at:-

Caroline Chalk
Head of External Information Services
Civil Aviation Authority
Aviation House
Gatwick Airport South
Gatwick
RH6 0YR

caroline.chalk@caa.co.uk

The CAA has a formal internal review process for dealing with appeals or complaints in connection with Freedom of Information requests. The key steps in this process are set in the attachment.

Should you remain dissatisfied with the outcome you have a right under Section 50 of the FOIA to appeal against the decision by contacting the Information Commissioner at:-

Information Commissioner's Office
FOI/EIR Complaints Resolution
Wycliffe House
Water Lane
Wilmslow
SK9 5AF
www.ico.gov.uk/complaints.aspx

If you wish to request further information from the CAA, please use the form on the CAA website at <http://www.caa.co.uk/application.aspx?catid=286&pagetype=65&appid=24>.

Yours sincerely

A handwritten signature in black ink, appearing to read 'M Stevens'. The signature is written in a cursive style with a large initial 'M' and a loop at the end.

Mark Stevens
External Response Manager

CAA INTERNAL REVIEW & COMPLAINTS PROCEDURE

- The original case to which the appeal or complaint relates is identified and the case file is made available;
- The appeal or complaint is allocated to an Appeal Manager, the appeal is acknowledged and the details of the Appeal Manager are provided to the applicant;
- The Appeal Manager reviews the case to understand the nature of the appeal or complaint, reviews the actions and decisions taken in connection with the original case and takes account of any new information that may have been received. This will typically require contact with those persons involved in the original case and consultation with the CAA Legal Department;
- The Appeal Manager concludes the review and, after consultation with those involved with the case, and with the CAA Legal Department, agrees on the course of action to be taken;
- The Appeal Manager prepares the necessary response and collates any information to be provided to the applicant;
- The response and any necessary information is sent to the applicant, together with information about further rights of appeal to the Information Commissioners Office, including full contact details.

Freedom of Information Act: Section 40

(1) Any information to which a request for information relates is exempt information if it constitutes personal data of which the applicant is the data subject.

(2) Any information to which a request for information relates is also exempt information if-

- (a) it constitutes personal data which do not fall within subsection (1), and
- (b) either the first or the second condition below is satisfied.

(3) The first condition is-

(a) in a case where the information falls within any of paragraphs (a) to (d) of the definition of "data" in section 1(1) of the Data Protection Act 1998, that the disclosure of the information to a member of the public otherwise than under this Act would contravene-

- (i) any of the data protection principles, or
- (ii) section 10 of that Act (right to prevent processing likely to cause damage or distress), and

(b) in any other case, that the disclosure of the information to a member of the public otherwise than under this Act would contravene any of the data protection principles if the exemptions in section 33A(1) of the Data Protection Act 1998 (which relate to manual data held by public authorities) were disregarded.

(4) The second condition is that by virtue of any provision of Part IV of the Data Protection Act 1998 the information is exempt from section 7(1)(c) of that Act (data subject's right of access to personal data).

(5) The duty to confirm or deny-

(a) does not arise in relation to information which is (or if it were held by the public authority would be) exempt information by virtue of subsection (1), and

(b) does not arise in relation to other information if or to the extent that either-

- (i) the giving to a member of the public of the confirmation or denial that would have to be given to comply with section 1(1)(a) would (apart from this Act) contravene any of the data protection principles or section 10 of the Data Protection Act 1998 or would do so if the exemptions in section 33A(1) of that Act were disregarded, or
- (ii) by virtue of any provision of Part IV of the Data Protection Act 1998 the information is exempt from section 7(1)(a) of that Act (data subject's right to be informed whether personal data being processed).

(6) In determining for the purposes of this section whether anything done before 24th October 2007 would contravene any of the data protection principles, the exemptions in Part III of Schedule 8 to the Data Protection Act 1998 shall be disregarded.

(7) In this section-

"the data protection principles" means the principles set out in Part I of Schedule 1 to the Data Protection Act 1998, as read subject to Part II of that Schedule and section 27(1) of that Act;

"data subject" has the same meaning as in section 1(1) of that Act;

"personal data" has the same meaning as in section 1(1) of that Act.

SMALL UAS RELATED AIR NAVIGATION ORDER ARTICLES

Small Unmanned Aircraft

166 (1) A person shall not cause or permit any article or animal (whether or not attached to a parachute) to be dropped from a small aircraft so as to endanger persons or property.

(2) The person in charge of a small unmanned aircraft may only fly the aircraft if reasonably satisfied that the flight can safely be made.

(3) The person in charge of a small unmanned aircraft must maintain direct, unaided visual contact with the aircraft sufficient to monitor its flight path in relation to other aircraft, persons, vehicles, vessels and structures for the purpose of avoiding collisions.

(4) The person in charge of a small unmanned aircraft which has a mass of more than 7 kg excluding its fuel but including any articles installed in or attached to the aircraft at the commencement of its flight, must not fly the aircraft:

- (a) in Class A, C, D or E airspace unless the permission of the appropriate air traffic control unit has been obtained;
- (b) within an aerodrome traffic zone during the notified hours of watch of the air traffic unit (if any) at that aerodrome unless the permission of any such air traffic control unit has been obtained; or
- (c) at a height of more than 400 feet above the surface unless it is flying in airspace described in sub-paragraph (a) or (b) above and in accordance with the requirements for that airspace.

(5) The person in charge of a small unmanned aircraft must not fly such an aircraft for the purposes of aerial work except in accordance with a permission granted by the CAA.

Small unmanned surveillance aircraft

167 (1) The person in charge of a small unmanned surveillance aircraft must not fly the aircraft in any of the circumstances described in paragraph (2) except in accordance with a permission issued by the CAA.

(2) The circumstances referred to in paragraph (1) are:

- (a) over or within 150 metres of any congested area;
- (b) over or within 150 metres of an organised open-air assembly of more than 1,000 persons;
- (c) within 50 metres of any vessel, vehicle or structure which is not under the control of the person in charge of the aircraft; or
- (d) subject to paragraphs (3) and (4), within 50 metres of any person.

(3) Subject to paragraph (4), during take-off or landing, a small unmanned surveillance aircraft must not be flown within 30 metres of any person.

(4) Paragraphs (2)(d) and (3) do not apply to the person in charge of the small unmanned surveillance aircraft or a person under the control of the person in charge of the aircraft.

(5) In this article 'a small unmanned surveillance aircraft' means a small unmanned aircraft which is equipped to undertake any form of surveillance or data acquisition.

Congested Area – In relation to a city, town or settlement, any area which is substantially used for residential, commercial, industrial or recreational purposes.

Stevens Mark

From: [REDACTED]
Sent: 01 July 2014 09:49
To: [REDACTED]
Subject: FW: Request for Meeting - Amazon

FYI.

From: [REDACTED]@clydeco.com]
Sent: 01 July 2014 09:41
To: Kelleher Padhraic
Cc: [REDACTED]
Subject: RE: Request for Meeting - Amazon

Dear [REDACTED]

Thank you for your email.

We can confirm that the meeting will be attended by [REDACTED] and [REDACTED]

[REDACTED] and [REDACTED] form part of the Amazon / Prime Air legal team, but please note that their attendance at the kick-off meeting is simply a reflection of the way in which the UAS working group within Amazon has been structured. The intended purpose of the meeting is to give the CAA an overview of the Prime Air project and explore how Amazon / Prime Air might work with the CAA going forward in developing the programme. There is no intention to discuss specific legal issues during this meeting.

I confirm that Clyde & Co will not be attending the meeting.

Please do let me know if you require any further details.

Kind regards

[REDACTED]

[REDACTED]
Senior Associate | Clyde & Co LLP
Direct Dial: [REDACTED] Mobile: [REDACTED]

CLYDE & CO

The St Botolph Building | 138 Houndsditch | London EC3A 7AR | UK
Main +44 20 7876 5000 | Fax +44 20 7876 5111 | www.clydeco.com

From: Kelleher Padhraic [<mailto:Padhraic.Kelleher@caa.co.uk>]
Sent: 01 July 2014 08:19
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Request for Meeting - Amazon

Hi [REDACTED]

Do you have the names of the other Amazon attendees for tomorrow's meeting?

Regards.

From: [REDACTED]@clydeco.com]
Sent: 30 June 2014 08:16
To: [REDACTED]
Cc: [REDACTED]
Subject: Re: Request for Meeting - Amazon

Many thanks [REDACTED]

Kind regards

From: [REDACTED]@caa.co.uk]
Sent: Monday, June 30, 2014 07:55 AM
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Request for Meeting - Amazon

Hi [REDACTED]

Yes, [REDACTED] will be available as well.

Regards.

From: [REDACTED]@clydeco.com]
Sent: 30 June 2014 07:54
To: [REDACTED]
Cc: [REDACTED]
Subject: Re: Request for Meeting - Amazon

Dear [REDACTED]

Many thanks for your email. I can confirm that 1600 on 2 July would be convenient. Can I assume that [REDACTED] will also be available at that time?

As requested I will confirm details of other Amazon attendees by tomorrow at the latest.

Kind regards

From: [REDACTED]@caa.co.uk]
Sent: Monday, June 30, 2014 07:41 AM
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Request for Meeting - Amazon

Dear [REDACTED]

Thank you for your email.

Due to Padhraic's other appointments the only other time on 2 July would be 1600 for the meeting. Please can you advise if this is convenient.

If I could have the names of the other Amazon attendees today or Tuesday morning then that would be of assistance for Security.

Kind regards.

[Redacted]

[Redacted]

Civil Aviation Authority

Te: [Redacted]

www.caa.co.uk

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From: [Redacted]@clydeco.com]

Sent: 27 June 2014 16:33

To: [Redacted]

Cc: [Redacted]

Subject: RE: Request for Meeting - Amazon

Dear [Redacted]

By way of introduction, I work with [Redacted] in the aviation team at Clyde & Co in London.

Further to my earlier voicemail I confirm that the proposed meeting date of 2 July 2014 is convenient for Amazon. Thank you again for making these arrangements at short notice.

It is proposed that the meeting will be attended by [Redacted] (Clyde & Co), [Redacted] and [Redacted] (Amazon) and a further two Amazon staff. We will be in a position to confirm details of the additional attendees during the course of Monday.

Due to Amazon staff travelling in from overseas, would it perhaps be possible to schedule the meeting for the afternoon of 2 July 2014 instead of the morning?

Kind regards

Tom

[Redacted]

Senior Associate | Clyde & Co LLP

Direct Dial: [Redacted] | Mobile: [Redacted]

CLYDE & CO

The St Botolph Building | 138 Houndsditch | London EC3A 7AR | UK
Main: +44 20 7876 5000 | Fax: +44 20 7876 5111 | www.clydeco.com

From: [Redacted]@caa.co.uk]

Sent: Thursday, June 26, 2014 01:30 PM GMT Standard Time

To: [REDACTED]
Subject: RE: Request for Meeting - Amazon

Dear [REDACTED]

Further to your recent conversation and correspondence with [REDACTED] Mr Padhraic Kelleher, Head of Intelligence, Strategy & Policy (ISP), CAA, would be pleased to meet with Amazon on the topic of UAS.

Padhraic will be available for this meeting on 2 July at 1030 at the CAA's office in London and will be accompanied by [REDACTED] our UAS Policy Specialist. The office address is: 45-59 Kingsway, London, WC2B 6TE.

Please can you advise if this date/time is convenient and if yes the persons from Amazon/Clyde & Co who will be attending the meeting.

Regards.

[REDACTED]

[REDACTED]

Civil Aviation Authority

Te: [REDACTED]

www.caa.co.uk

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From: [REDACTED]@clydeco.com]

Sent: 26 June 2014 11:15

To: [REDACTED]

Subject: Request for Meeting - Amazon

Dear [REDACTED]

Thank you for your time just now. Just to summarise my rapid monologue over the telephone:

We are advising Amazon in connection with their Prime Air unmanned aircraft system programme and have recommended that they should engage with the CAA. Hence my phone call to the Director's office. I understand that some senior Amazon management will be in London next week (in particular on the 2nd and 3rd of July).

Since we are a law firm, I should say that I do not expect this would be a meeting involving lawyers; I understand it is aimed at explaining Amazon's programme and opening a line of communication to explore how it might proceed in the UK.

Regards

[REDACTED]

[REDACTED]

Partner | Clyde & Co LLP

Direct Dial: [REDACTED] Mobiles: [REDACTED]

CLYDE & CO

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Stevens Mark

From: [REDACTED]@amazon.lu>
Sent: 28 July 2014 09:59
To: [REDACTED]
Subject: RE: UK DfT Contact

Hi [REDACTED]

Thank you for the contact.

The pleasure was for us to have been able to discuss openly with you and your colleagues. It was a very fruitful meeting.

Should the decision to start testing in the UK be confirmed by Seattle, I will contact you before approaching [REDACTED] and to discuss further how to tackle the issue of public perception.

I look forward to meeting you again.

Best Regards,
[REDACTED]

From: [REDACTED]@caa.co.uk]
Sent: 28 July 2014 10:41
To: [REDACTED]
Subject: UK DfT Contact

Morning [REDACTED]

It was really good to meet up again last week. As requested please see below contact details for DfT. [REDACTED] is the policy lead for aviation safety and is our key point of contact for all things UAS.



Regards

[REDACTED]

Safety and Airspace Regulation Group
Civil Aviation Authority
Aviation House
Gatwick Airport South
W Sussex
RH6 0YR
Tel: [REDACTED]
E-mail: [REDACTED]@caa.co.uk

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Stevens Mark

From: [REDACTED]@amazon.com>
Sent: 12 July 2014 00:39
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Amazon Meeting with UK CAA

Hi [REDACTED]

It looks like the 24th will work for us, I am just waiting for one final confirmation on Monday. The timing you suggest will also work well. Our group will be six people, and I will confirm final attendees next week.

Regards,

[REDACTED]

[REDACTED] | Amazon.com
Corporate Counsel, [Prime Air](#)
440 Terry Ave. North | Seattle, WA 98109-5210
direct: [REDACTED] | fax: [REDACTED]
[REDACTED]@amazon.com

From: [REDACTED]@caa.co.uk]
Sent: Thursday, July 10, 2014 2:33 AM
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Amazon Meeting with UK CAA

Morning [REDACTED]

The 24th July looks good for us. I suggest that we do a mid-morning start with a break for lunch and then finish by mid-afternoon. This will give your team the flexibility to go away for lunch and review the morning's discussions. Does this suit your needs? If I could have a rough number of attendees from Amazon (names can follow later) I can then book an appropriate meeting room.

Regards

[REDACTED]

[REDACTED]

Safety and Airspace Regulation Group
Civil Aviation Authority
Aviation House
Gatwick Airport South
W Sussex
RH6 0YR
Tel: [REDACTED]
E-mail: [REDACTED]@caa.co.uk

From: [REDACTED]@amazon.com]
Sent: 10 July 2014 01:39
To: [REDACTED]

Cc: [REDACTED]
Subject: RE: Amazon Meeting with UK CAA

Hello [REDACTED]

Thank you again for your time last week. We really appreciate the information you shared, and the offers of assistance. Our team would like to take you up on your offer to meet with CAA certification and other experts to discuss how we move forward with testing Prime Air in the UK. In the meantime, we are working on our test site scenario with the goal to send it to you in advance of the meeting. Would you and your colleagues be available for a meeting the afternoon of July 24 at your offices in London? If that date does not work, just let me know and I will circle back with an alternate proposal.

We plan to speak with [REDACTED] later this week. Please feel free to reach out to him any time after Friday and he will be expecting your call. We are also looking into ASTRAEA and will let you know before our meeting regarding your offer to make an introduction.

Kind regards,

[REDACTED]

[REDACTED] | [Amazon.com](#)
Corporate Counsel, Prime Air
440 Terry Ave. North | Seattle, WA 98109-5210
direct: [REDACTED] | fax: [REDACTED]
[REDACTED]@amazon.com

From: [REDACTED]
Sent: Thursday, July 03, 2014 2:46 AM
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Amazon Meeting with UK CAA

Hello [REDACTED]

Thank you for putting together this summary and for your time meeting with us yesterday. Please expect more details from me in the next week on the Amazon items below.

Kind regards,

[REDACTED]

[REDACTED] | [Amazon.com](#)
Corporate Counsel, Prime Air
440 Terry Ave. North | Seattle, WA 98109-5210
direct: [REDACTED] | fax: [REDACTED]
[REDACTED]@amazon.com

From: [REDACTED]
Sent: 7/3/2014 8:44 AM
To: [REDACTED]
Cc: [REDACTED]
Subject: Amazon Meeting with UK CAA

Morning [REDACTED]

It was really good to meet you all yesterday. I thought it would be useful to send a summary of what we thought were the salient points from the meeting:

1. Amazon to agree with the FAA that they can talk to us openly – I will then make contact with FAA's [REDACTED] to seek a joint approach to the Prime Air project;
2. I will send you information on Parc Aberporth (and Llanbedr) detailing what Amazon would have to do to get approval to test there;
3. Amazon to send me the scenario for an Amazon-controlled remote test site in the UK;
4. When you are ready, I will organise a certification brief for your team with our expert to review the certification process. If you would prefer I could get a written brief to you ahead of any meeting;
5. I will arrange a meeting at the appropriate time, bringing in other experts from the CAA, to identify how we can help each other;
6. Could you confirm whether you wish to make contact with ASTRAEA – if so I can make the necessary introductions;
7. I will send you an outline of our proposal for funding our involvement.

My apologies for not having a business card on hand to give you yesterday, however please see below my contact details for future reference. I hope you enjoy the (unusual) weather whilst you are over here, and I wish you a safe journey back home.

Regards

[REDACTED]

[REDACTED]

Safety and Airspace Regulation Group
Civil Aviation Authority
Aviation House
Gatwick Airport South
W Sussex
RH6 0YR
Tel: [REDACTED]
E-mail: [REDACTED]@caa.co.uk

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