

[REDACTED]
[REDACTED]

23 May 2017
Reference: F0003135

Dear [REDACTED]

I am writing in respect of your recent request of 27 March 2017, for the release of information held by the Civil Aviation Authority (CAA). I am sorry for the delay in responding to your request for information.

Your request has been considered in line with the provisions of the Freedom of Information Act 2000 (FOIA). Your request:

I am writing under the Freedom of Information Act to request information from CAA regarding Amazon's drone testing in the U.K. Please provide records for the following:

- 1. How many total drone flights has Amazon conducted? Please provide a list of all flights by Amazon drones (Amazon Prime Air) in the U.K. Please include the date, duration, distance travelled, delivery location and objects delivered by the drones.***

The CAA do not record or actively monitor the number of drone flights that are conducted, therefore, the information you have requested is not held by the CAA.

- 2. All CAA records of crashes, air proximity (airprox) incidents, accidents, bird strikes, injuries or property damage involving an Amazon drone. Please provide any correspondence between CAA and Amazon discussing any such incident.***

Incidents involving the operation of a drone can be reported to the CAA through two routes:

- The UK Airprox Board (UKAB), which is sponsored jointly by the CAA and UK Military Aviation Authority, collects reports of airprox incidents and produces a regular review of assessed airprox incidents, which is published on the UKAB website. UKAB have checked their records and have confirmed that they have no record of any airprox incidents involving Amazon drones.
- Any person involved who has knowledge of an occurrence of an accident or serious incident (as defined in [CAP 722](#)) in UK airspace must report it to the

AAIB. All other occurrences must be reported under the CAA's Mandatory Occurrence Reporting Scheme. Any reports received through the scheme are held in accordance with Regulation (EU) No. 376/2014 on the reporting, analysis and follow-up of occurrences in civil aviation. An occurrence means any safety-related event which endangers or which, if not corrected or addressed, could endanger an aircraft, its occupants or any other person.

We can neither confirm nor deny whether we hold relevant information. The Regulation requires that appropriate measures are put in place to ensure that occurrence reports, analysis and follow up actions are kept confidential.

The Regulation prohibits disclosure of information on occurrences for any purpose other than the maintenance or improvement of aviation safety, which includes under the FOIA. Therefore, any such information is exempt from release under Section 44(1)(b) of the FOIA.

However, if you consider that you require the information for the purpose of maintaining or improving aviation safety, you are able to make an application to the CAA on that basis using the form at www.caa.co.uk/srg1605.

- 3. A copy of the rules governing Amazon's drone-delivery flights. What are the regulations Amazon must abide by to conduct drone (Air Prime) tests, including altitude limitations (maximum and minimum height Amazon can fly during deliveries) and landing requirements (such as protections for animals). Please provide records of incidents in which Amazon violated the rules, including the date and nature of the violation.**

The rules that apply to Amazon are the same as those that apply to any other airspace user and are contained within the United Kingdom Air Navigation Order (ANO) 2016. The CAA does, however, have the ability to issue an Exemption from many of the requirements of the ANO if it is satisfied that the operation can still be conducted safely. The principles and processes surrounding the operation of unmanned aircraft within UK airspace are contained within [CAP 722](#), the CAA's UAS guidance document.

A redacted copy of the latest operating Exemption that has been issued to Amazon can be found attached. You will find that some information contained within the exemption have been redacted, it is the CAA's view that the information should not be released for the reasons set out below.

Section 44 – Prohibitions on disclosure

Information which was submitted to the CAA by Amazon in support of their application for an exemption from the ANO has been redacted. The release of information that was provided to the CAA as part of the requirements to obtain an exemption from the ANO is prohibited from disclosure by Section 23 of the Civil Aviation Act 1982. Under Section 23, any information which relates to a particular person or organisation, and has been furnished to the CAA pursuant to an Air Navigation Order, must not be disclosed by the CAA unless such disclosure is authorised by one of the exemptions contained in Section 23 itself.

Section 44(1)(a) of the FOIA provides that information is exempt if its disclosure is prohibited by, or under any enactment and Section 23 of the Civil Aviation Act is such a statutory prohibition. Section 44 is an absolute exemption and is not subject to the public interest test.

Section 43 – Commercial interest

The CAA's view is that disclosure would reveal unique information relating to Amazon's drone operations and is commercially sensitive. Such information is exempt under Section 43(2) of the FOIA, which covers information where disclosure would, or would be likely to, prejudice the commercial interest of any person. A person may be an individual, company, the public authority itself or any other legal entity.

Release of this information into the public domain would make commercially sensitive information about Amazon's drone operations available to competitors, revealing Amazon's operational strategies, which has the potential to be exploited by competitors. Disclosure would therefore prejudice the commercial interests of Amazon by affecting their ability to compete fairly.

As Section 43 is a qualified exemption, we have also considered whether, in all the circumstances of the case, the public interest in withholding the information outweighs the public interest in disclosure.

The public interest in disclosing the information include the general principles of transparency and open government, the public right of access to information held and how the CAA performs its regulatory roles. The CAA recognises that with the increased use of drones over recent years, there is a broader public interest in how the CAA considers applications for the use of drones.

However, there is a strong public interest in allowing companies to carry out their commercial activities, free from outside pressures and in a fair competitive environment, without having their work exploited by competitors.

Having considered the factors on both sides the CAA has concluded that, in relation to the information redacted in accordance with Section 43(2), the public interest in disclosure is outweighed by the public interest in maintaining the exemption and the information has, therefore, been withheld.

Section 40 – Personal Information

We have redacted personal data 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. Section 40 is an absolute exemption and is not subject to the public interest test.

In relation to your request for records of incidents in which Amazon violated the rules, we can neither confirm nor deny whether we hold relevant information to your request and therefore, Section 30(3) applies to this section of your request.

Section 30 – Investigations and Proceedings conducted by public authorities

30(3) The duty to confirm or deny does no 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) or (2).

Section 30 is a class based qualified exemption and consideration of the public interest must be given as to whether neither confirming nor denying whether information is held is the appropriate response.

The public interest in confirming whether any relevant information is held would lead to better transparency and open government and the accountability of the CAA for its decisions and enforcement actions.

However, there is a strong public interest in ensuring the effective investigation of possible offences and it is our view that revealing whether or not a particular organisation may have committed an offence would interfere with the effective conduct of any current or future investigations. We consider that any information, if held, would be exempt from disclosure under Section 30(3) by virtue of Section 30(1)(a).

We, therefore, conclude that the public interest in confirming or denying whether information is held is outweighed by the public interest in maintaining the exemption.

- 4. All correspondence between CAA and Amazon, including e-mails and details of meetings. Please include records from meetings -- notes, minutes and presentation materials such as PowerPoints slides. Please also provide all correspondence with any outside group representing Amazon, including law firms, contractors, advocacy groups or university partners.**

We responded to a similar request back in August 2016 and the information released at that time can be found using the following link:
http://www.caa.co.uk/uploadedFiles/CAA/Content/Standard_Content/Our_work/Information_requests/Disclosure_log/2016/F0002892Reply.pdf.

Further copies of communications that have taken place between Amazon and the CAA can also be found attached.

As you will see, we have either removed or redacted some information, which is exempt from disclosure under Section 44, Section 43 and Section 40. The reasons why the exemptions apply are the same as those explained in question 3 of your request. In addition, we also consider that Section 41 applies to some information in this part of your request and the reason is set out below.

Section 41 – Information provided in confidence

In addition, we have also redacted information on page 2 and 7 as it relates to information to be discussed at planned meetings and we consider that the information itself holds the necessary quality of confidence and therefore, should be protected. Disclosure would be a breach of that confidence and this information is therefore exempt from disclosure under section 41 of the FOIA.

A copy of all relevant exemptions under FOIA can be found at the end of this letter.

For further information on the specifics of Amazon's current and intended operations, we would suggest that you approached 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
<https://ico.org.uk/concerns/>

If you wish to request further information from the CAA, please use the form on the CAA website at <http://publicapps.caa.co.uk/modalapplication.aspx?appid=24>.

Yours sincerely

A handwritten signature in black ink that reads "Rihanne Stephen". The signature is written in a cursive, flowing style.

Rihanne Stephen
Information Rights Officer

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 44

(1) Information is exempt information if its disclosure (otherwise than under this Act) by the public authority holding it-

- (a) is prohibited by or under any enactment,
- (b) is incompatible with any Community obligation, or
- (c) would constitute or be punishable as a contempt of court.

(2) The duty to confirm or deny does not arise if the confirmation or denial that would have to be given to comply with section 1(1)(a) would (apart from this Act) fall within any of paragraphs (a) to (c) of subsection (1).

Freedom of Information Act : Section 30

(1) Information held by a public authority is exempt information if it has at any time been held by the authority for the purposes of-

- (a) any investigation which the public authority has a duty to conduct with a view to it being ascertained-
 - (i) whether a person should be charged with an offence, or
 - (ii) whether a person charged with an offence is guilty of it,
- (b) any investigation which is conducted by the authority and in the circumstances may lead to a decision by the authority to institute criminal proceedings which the authority has power to conduct, or
- (c) any criminal proceedings which the authority has power to conduct.

(2) Information held by a public authority is exempt information if-

- (a) it was obtained or recorded by the authority for the purposes of its functions relating to-
 - (i) investigations falling within subsection (1)(a) or (b),
 - (ii) criminal proceedings which the authority has power to conduct,
 - (iii) investigations (other than investigations falling within subsection (1)(a) or (b)) which are conducted by the authority for any of the purposes specified in section 31(2) and either by virtue of Her Majesty's prerogative or by virtue of powers conferred by or under any enactment, or
 - (iv) civil proceedings which are brought by or on behalf of the authority and arise out of such investigations, and
- (b) it relates to the obtaining of information from confidential sources.

(3) The duty to confirm or deny 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) or (2).

Freedom of Information Act: Section 43

(1) Information is exempt information if it constitutes a trade secret.

(2) Information is exempt information if its disclosure under this Act would, or would be likely to, prejudice the commercial interests of any person (including the public authority holding it).

(3) The duty to confirm or deny does not arise if, or to the extent that, compliance with section 1(1)(a) would, or would be likely to, prejudice the interests mentioned in subsection (2).

Freedom of Information Act: Section 41

(1) Information is exempt information if-

- (a) it was obtained by the public authority from any other person (including another public authority), and
- (b) the disclosure of the information to the public (otherwise than under this Act) by the public authority holding it would constitute a breach of confidence actionable by that or any other person.

(2) The duty to confirm or deny does not arise if, or to the extent that, the confirmation or denial that would have to be given to comply with section 1(1)(a) would (apart from this Act) constitute an actionable breach of confidence.

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.

CIVIL AVIATION AUTHORITY

Air Navigation Order 2016

EXEMPTION – Unmanned Aircraft – Extended Visual Line of Sight (EVLOS)

1. The Civil Aviation Authority, in exercise of its powers under Article 266 of the Air Navigation Order 2016 (“the said order”), as amended, hereby exempts [REDACTED] /Amazon Prime Air (“the operator”) from the provisions of the said Order with the exception of Articles 1-7, 68, 69, 75, 89, 97-100, 230, 237, 239, 240-242, 247, 248, 250-253, 255-257, 258, 261-265, 267 and Schedule 1 thereof, for the purpose of test and development flights of the following Unmanned Aircraft (“the said aircraft”):
 - (a) Various experimental unmanned aircraft (multirotor, fixed-wing and hybrid types) of MTOM not exceeding 40kg.

at [REDACTED]
 - (b) [REDACTED] as stated [REDACTED] effective 14 April 2016 and as amended [REDACTED] 21 June 2016;
2. The commander(s) of the said aircraft shall be Operators in Command (Oic) as designated by the operator.
3. This Permission is granted subject to the following conditions, namely, that the said aircraft shall not be flown:
 - (a) other than within direct, unaided visual-line-of-sight (VLOS). In addition to the commander of the said aircraft, the operator shall utilise one or more additional deployed visual observers to assist in alerting the commander to any hazard arising from aircraft or persons encroaching onto or above [REDACTED];
 - (b) unless the flights are conducted in accordance with the [REDACTED] effective 14 April 2016 and [REDACTED] effective 21 June 2016, except where varied by this permission or by future amendments to this permission;
 - (c) at a height exceeding **400 feet** above ground level;
 - (d) at a distance beyond the visual range of the person in charge of the said aircraft, or a maximum range of **500 metres (see EVLOS procedures at paragraph 4)**;
 - (e) directly overhead or within 150 metres of any congested area of a city, town or settlement.
 - (f) directly overhead or within 150 metres of an organised open-air assembly of more than 1,000 persons;
 - (g) directly overhead or within 50 metres of any person, vessel, vehicle or structure that is not under the control of the person in charge of the said aircraft, except that during take-off and landing this distance may be reduced to 30 metres;
 - (h) unless the permission of the landowner on whose land the said aircraft is intended to takeoff and land, has been obtained;
 - (i) unless it is equipped with a mechanism [REDACTED] that will cause the said aircraft to land or intentionally cease flying in the event of disruption to or a failure of any of its control systems, including the primary radio link, and the operator/Oic of the said aircraft has satisfied himself that such mechanism is in working order before the aircraft commences its flight.

Each of the said aircraft capable of flying in wing-borne flight shall in addition have a fail-safe reversionary mode ([REDACTED]) that, in the event that the communications link to the main controller is lost or the [REDACTED] is activated, the aircraft enters a [REDACTED] or a [REDACTED] [REDACTED];

- (j) unless the operator of the said aircraft has reasonably satisfied himself that any load carried by the said aircraft is properly secured, that the aircraft is in an airworthy condition and that the flight can safely be made taking into account the wind and other significant weather conditions;
- (k) unless the person in charge of the said aircraft maintains records of each flight made pursuant to this Exemption and makes such records available to the Authority on request;
- (l) unless the said aircraft is insured in accordance with Regulation (EC) 785/2004 on insurance requirements for air carriers and aircraft operators.

EVLOS procedures:

- 4. Additionally, if a flight takes place in accordance with the Amazon Prime Air EVLOS OSC [REDACTED] [REDACTED] effective 21 June 2016, then paragraph 3(d) shall not apply provided that:
 - (a) the flight(s) are NOTAMed;
 - (b) for each flight, the operator calculates and applies the necessary lateral extent of the [REDACTED] [REDACTED] in relation to the said aircraft's performance. In all cases of wing-borne flight, the lateral extent of the [REDACTED] shall not be less than 250 metres from the [REDACTED] [REDACTED]. Multirotor aircraft shall not be flown closer than 150 metres to the [REDACTED].
 - (c) direct, unaided visual contact with the said aircraft sufficient to monitor its flight path for the purposes of avoiding collisions is maintained. This requirement may be met by using deployed [REDACTED] [REDACTED] referred to in the [REDACTED];
- 5. All persons under the control of the operator of the said aircraft at the operating site and who could be affected by the planned flight operations, must have received a written or oral safety and operational brief on the proposed flight operations and, where necessary, have rehearsed their actions during the planned flight operations.
- 6. This Permission shall have effect during daylight hours over the period **05 September 2016 to 05 September 2017**, unless subsequently varied, suspended or revoked.

Date: 05 September 2016

for the Civil Aviation Authority

Ref: 20160905 [REDACTED] PAndE+20kgEVLOS
SSC Technical Services 01293 573528

Distribution:

[REDACTED], CAA ISP ([REDACTED]@caa.co.uk)
[REDACTED] ([REDACTED]@amazon.co.uk [REDACTED]@amazon.co.uk)

From: [REDACTED]
To: [REDACTED]
Subject: RE: Amazon Prime Air Site Visit
Date: 21 October 2016 11:17:45
Attachments: [image001.png](#)

No worries. We look forward to seeing you Tuesday. Same location as last year.

From: [REDACTED] [mailto:[REDACTED]@caa.co.uk]
Sent: Friday, October 21, 2016 9:32 AM
To: [REDACTED] <[REDACTED]@amazon.co.uk>
Subject: RE: Amazon Prime Air Site Visit

Hi [REDACTED],

Sorry for the slight delay in getting back to you, I've been out a lot.

The final CAA names for next Tuesday are myself, [REDACTED] and [REDACTED].

We'll be travelling together and will be aiming to get there for 1030. I'm assuming that it is the same location as last year?

[REDACTED]
[REDACTED]
[REDACTED]
Intelligence, Strategy and Policy
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] [mailto:[REDACTED]@amazon.co.uk]
Sent: 17 October 2016 13:15
To: [REDACTED]
Subject: RE: Amazon Prime Air Site Visit

Thanks [REDACTED]. Keep us posted. Look forward to the visit.

From: [REDACTED] [mailto:[REDACTED]@caa.co.uk]
Sent: Saturday, October 15, 2016 11:13 AM
To: [REDACTED] [mailto:[REDACTED]@amazon.co.uk]
Subject: RE: Amazon Prime Air Site Visit

Thanks [REDACTED],

I'll check with the others and confirm names shortly. [REDACTED] and [REDACTED] are not

now able to come.

Regarding the timings, this seems fine for now. [REDACTED] and I are in Cologne all day on Monday – we'll aim to get there for 1030 but obviously we can't guarantee the traffic.

[REDACTED]
[REDACTED]
[REDACTED]
Intelligence, Strategy and Policy
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] [mailto:[REDACTED]@amazon.co.uk]
Sent: 14 October 2016 15:17
To: [REDACTED]
Subject: Amazon Prime Air Site Visit

[REDACTED],

Just confirming that we are still on for a site visit on October 25th. CAA attendees are as follows:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

We are proposing that you arrive at 1030 with a planned departure of no later than 1230. If this work let me know and Ill formalize the agenda.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED] | [REDACTED]
Mobile – [REDACTED]
Office – [REDACTED]



“Don't confuse motion with action” – B. Franklin

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From: [REDACTED]
To: [REDACTED]
Subject: RE: [REDACTED]
Date: 28 February 2017 13:45:36
Attachments: [image001.png](#)

[REDACTED],

Hope you're doing well. I've tried calling to follow-up on the [REDACTED]
[REDACTED]. Please give me a call at your convenience.

From: [REDACTED]
Sent: Thursday, February 23, 2017 10:00 AM
To: [REDACTED] ' <[REDACTED]@caa.co.uk>
Subject: RE: [REDACTED]

[REDACTED],

As requested I'm reaching out as a follow-up to our discussion on Monday. I'll give you a call sometime tomorrow to discuss the proposal in additional detail. In the interim let me know if you need any specific points clarified. Thanks again for your time. Talk to you soon.

From: [REDACTED]
Sent: Monday, February 20, 2017 12:59 PM
To: [REDACTED] ' <[REDACTED]@caa.co.uk>
Subject: RE: [REDACTED]

[REDACTED],

Glad you're feeling better. As we discussed this morning, I'll give you a call Friday to talk further about the proposal and timelines. Additionally, keep an eye out for an invite for the 9th March. Talk to you soon.

From: [REDACTED] [[mailto:\[REDACTED\]@caa.co.uk](mailto:[REDACTED]@caa.co.uk)]
Sent: Monday, February 20, 2017 11:03 AM
To: [REDACTED] [REDACTED] <[\[REDACTED\]@amazon.co.uk](mailto:[REDACTED]@amazon.co.uk)>
Subject: RE: [REDACTED]

Hi [REDACTED],

I'm sorry that I haven't got back to you yet. I was away in Cologne with EASA Weds/Thurs last week and then went down with some sort of flu like illness which wiped me out over the weekend and I'm not completely back up to speed as yet.

I've got a few other urgent matters to get on with at the moment, so can you give me a couple of days and then get back in touch?

[REDACTED]

[Redacted]
[Redacted]

Intelligence, Strategy and Policy
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] [mailto:[Redacted]@amazon.co.uk]
Sent: 17 February 2017 09:44
To: [Redacted]
Subject: RE: [Redacted]

Morning [Redacted],

Just following up regarding the email below. Tried calling, rather than going through email. Please feel free to give me a call on my mobile at your convenience ([Redacted]). Talk to you soon.

From: [Redacted]
Sent: Monday, February 13, 2017 4:31 PM
To: [Redacted] <[Redacted]@caa.co.uk>
Subject: [Redacted]

[Redacted],

Happy 2017! Several months back we had a brief conversation relating to flying VLOS under our current permissions [Redacted]. That yielded a suggestion to [Redacted] [Redacted] [Redacted]. However, after reviewing our exemption we feel we can [Redacted] to include these [Redacted], rather than a [Redacted]. [Redacted]

Unfortunately in the approved ANO exemption, the letter specifically references that flights need to be conducted in accordance with [Redacted] unless varied by that permission or amendments to that permission. We have since been providing you with [Redacted] (as previously agreed), but with us up to [Redacted] we may start to have [Redacted].

[Redacted]
[Redacted]
[Redacted]
[Redacted] Please let me know your thoughts on this approach.

Are you available Wednesday afternoon to have a brief phone call on the topic?

Additionally, [REDACTED] will be in town on the 9th of March and hoping to set a meeting to discuss our 2017 approach. Let me know if your available.

[REDACTED] | [REDACTED]
Mobile – [REDACTED]
Office – [REDACTED]



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Please note that all e-mail messages sent to the Civil Aviation Authority are subject to monitoring / interception for lawful business.

=====

From: [REDACTED]
To: [REDACTED]
Subject: RE: [REDACTED]
Date: 17 March 2017 17:09:33
Attachments: [image002.png](#)

Enjoy the weekend.

[REDACTED]

- Sent for Nexus Device

On Mar 17, 2017 4:54 PM, [REDACTED] <[REDACTED]@caa.co.uk> wrote:

Thanks [REDACTED], all noted.

[REDACTED]
[REDACTED]
[REDACTED]

Intelligence, Strategy and Policy
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] [mailto:[REDACTED]@amazon.co.uk]
Sent: 17 March 2017 10:31
To: [REDACTED]
Subject: [REDACTED]

[REDACTED],

Wanted to give you a heads up [REDACTED] Please
[REDACTED] don't hesitate to contact me with any questions. Thanks.

[REDACTED] | [REDACTED]
Mobile – [REDACTED]
Office – [REDACTED]



“Don't confuse motion with action” – B. Franklin

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From: [REDACTED]
To: [REDACTED]
Subject: RE: 20160905-New Exemption for 40kg and EVLOS
Date: 05 September 2016 16:51:12

No worries. Thanks again.

From: [REDACTED] [mailto:[REDACTED]@caa.co.uk]
Sent: Monday, September 05, 2016 4:49 PM
To: [REDACTED] <[REDACTED]@amazon.co.uk>
Subject: RE: 20160905-New Exemption for 40kg and EVLOS

Yes ok, I must admit that your message about a visit had slipped my mind too, so I'll take another look at it.

[REDACTED]
[REDACTED]
[REDACTED]
Intelligence, Strategy and Policy
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] [mailto:[REDACTED]@amazon.co.uk]
Sent: 05 September 2016 16:44
To: [REDACTED]
Subject: RE: 20160905-New Exemption for 40kg and EVLOS

[REDACTED],

Thank you very much for sending this our way. I really appreciate all your help and coordination on this.

No worries on the delay, I know lots of threads are running parallel on your end. Once the "official" exemption is sent perhaps we could sync over the phone to coordinate a future visit. Talk to you soon.

From: [REDACTED] [mailto:[REDACTED]@caa.co.uk]
Sent: Monday, September 05, 2016 4:20 PM
To: [REDACTED] [mailto:[REDACTED]@amazon.co.uk]
Subject: 20160905-New Exemption for 40kg and EVLOS

[REDACTED],

Just a quick note to let you know that the new Exemption has been signed and will be sent to

you in the next day or so. However, I've attached a copy of the word document for your information.

Until the actual document arrives, please take this message as your approval to operate in accordance with the conditions stated.

I'm sorry for the delay; I only got back from leave today and then discovered (via a message from [REDACTED] at the DfT) that the approval had not been sent out to you yet.

[REDACTED]
[REDACTED]
[REDACTED]

Intelligence, Strategy and Policy
Safety and Airspace Regulation Group
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RH6 0YR
Tel: [REDACTED]
E-mail: [REDACTED]@caa.co.uk

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From: [REDACTED]
To: [REDACTED]
Subject: Quick catch up?
Date: 09 February 2017 16:26:08

Hi [REDACTED],

Hope all is well in your world. I need to chat with you very briefly if at all possible- would u be free for a quick call in about 20 mins?

Thanks,

[REDACTED]

From my mobile

From: [REDACTED]
To: [REDACTED]
Subject: RE: 20160914-RE: Filming Requirements / Facility Visit
Date: 22 September 2016 09:10:34
Attachments: [image001.png](#)

[REDACTED],

Agree. [REDACTED] will be directly reaching out to [REDACTED] to alleviate the “middle man” syndrome. The same applies to [REDACTED] and [REDACTED] from your corporate communications team. [REDACTED] from PR will be reaching out to them directly regarding attendance. At this point in time our attendee list is as follows;

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

I'll shoot you a proposed schedule in the coming weeks. Look forward to having you and the team on the 25th of October 😊

Talk to you soon.

From: [REDACTED] [mailto:[REDACTED]@caa.co.uk]
Sent: Wednesday, September 21, 2016 4:12 PM
To: [REDACTED] <[REDACTED]@amazon.co.uk>
Subject: RE: 20160914-RE: Filming Requirements / Facility Visit

Ok that's fine,

If [REDACTED] wants to liaise/discuss to [REDACTED] (AAIB) directly, then his email address is [REDACTED]@aaib.gov.uk . To be quite honest, they might as well just talk to each other and sort things out rather than use me and/or you as 'go-betweens'

[REDACTED]

From: [REDACTED] [mailto:[REDACTED]@amazon.co.uk]
Sent: 19 September 2016 10:33
To: [REDACTED]
Subject: RE: 20160914-RE: Filming Requirements / Facility Visit

[REDACTED],

Thanks for sharing the CAA attendees. Regarding the AAIB attendee, [REDACTED] should be reaching out to you soon to gather some additional details.

[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
Intelligence, Strategy and Policy
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] [mailto:[REDACTED]@amazon.co.uk]
Sent: 14 September 2016 10:32
To: [REDACTED]
Subject: RE: 20160824-RE: Filming Requirements / Facility Visit

[REDACTED],

As long as its weather permitting we will fly for sure. If the weather does not cooperate we will make it worthwhile. The facility update is worth the trip alone. October 25th is blocked off in our schedule. Once you have an attendee list and confirmations we will put together a formal schedule.

Regarding the attendees, we are aiming to maintain a high level of transparency so a slight extension of the CAA attendee list is ok on our end (as long as bound by same confidentiality requirements). We just request you provide a list of the attendees so we can prepare accordingly. I'm still pending a repose regarding the AAIB attendee, but don't foresee this being an issue. I'll let you know asap.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED] [mailto:[REDACTED]@caa.co.uk]
Sent: Friday, September 09, 2016 4:59 PM
To: [REDACTED] <[REDACTED]@amazon.co.uk>
Subject: RE: 20160824-RE: Filming Requirements / Facility Visit

[REDACTED],

Sorry for the slight delay in replying – Yes, Tues 25 Oct sounds to be good so let's plan for that. I'll circulate the date round the team and will let you know who is able to attend – obviously though, we would really wish to see some flying, so if it looks like the test schedule will preclude this, then we would prefer to select another date. Anyway, let's start a plan for the 25th.

The staff members that I'll be looking to bring will be similar to last time – the UAS policy team and the UAS approval team (ie. the people you will have directly been involved with), but I might look to extending this to one or two of our comms team as well (as they were closely involved with responding to questions following your Press release in the summer) – again, the aim is for us to keep up a level of awareness so that we are properly informed.

You may recall that I had a request from one of my colleagues at the AAIB (NTSB equivalent) if he could attend as well. Before I mention the date to him, did you manage to get any feelings for this being ok? He is bound by exactly the same confidentiality requirements as we are (probably tighter ones actually).

[REDACTED]
[REDACTED]
[REDACTED]
Intelligence, Strategy and Policy
Safety and Airspace Regulation Group
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Gatwick Airport South
W Sussex
RH6 0YR
Tel: [REDACTED]
E-mail: [REDACTED]@caa.co.uk

From: [REDACTED] [mailto:[REDACTED]@amazon.co.uk]
Sent: 06 September 2016 11:21
To: [REDACTED]; [REDACTED]
Cc: [REDACTED]
Subject: RE: 20160824-RE: Filming Requirements / Facility Visit

[REDACTED],

Tuesday October 25th for a site visit will work well for the team. Let me know the availability/attendance roster, and we will solidify/formalize the visit.

To avoid weather being a blocker, we will build flexibility into the days plan. Depending on our test schedule and progress we may not be flying on that day. [REDACTED]

[REDACTED] Regardless we will ensure the visit provides value and insight into our operational rigor and workflow.

Look forward to getting the ball rolling.

From: [REDACTED] [mailto:[REDACTED]@caa.co.uk]
Sent: Monday, September 05, 2016 5:05 PM
To: [REDACTED] <[REDACTED]@amazon.co.uk>; [REDACTED] <[REDACTED]@caa.co.uk>
Cc: [REDACTED] <[REDACTED]@caa.co.uk>
Subject: RE: 20160824-RE: Filming Requirements / Facility Visit

Hi [REDACTED],

Looking at your suggested dates, from a personal perspective, apart from 19, 20, 28 and 31 October, any of those dates are fine with me at the moment. I haven't checked up on other people's dates however as it will get too complicated.

It's unlikely that we would manage to get everyone together and so it is probably better for you to select a day (with a 'spare' for the weather perhaps) and we will see how many people we can get free – as I mentioned of course, don't start basing your filming activities around our availability though.

[REDACTED]
[REDACTED]
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W Sussex
RH6 0YR
Tel: [REDACTED]
E-mail: [REDACTED]@caa.co.uk

From: [REDACTED] [mailto:[REDACTED]@amazon.co.uk]
Sent: 01 September 2016 11:38
To: [REDACTED]; [REDACTED]
Cc: [REDACTED]
Subject: RE: 20160824-RE: Filming Requirements / Facility Visit

[REDACTED],

Just following up relating to an update on the [REDACTED]. Any progress?

Additionally, it looks like the week of October 12th – 14th (site visit) there is an unfortunate conflict. How about sometime between October 17th – 31st? Let us know what works best for the team.

From: [REDACTED]
Sent: Thursday, August 25, 2016 4:27 PM
To: [REDACTED] <[REDACTED]@caa.co.uk>; [REDACTED] <[REDACTED]@caa.co.uk>
Cc: [REDACTED] <[REDACTED]@caa.co.uk>; [REDACTED]@amazon.com' <[REDACTED]@amazon.com>
Subject: RE: 20160824-RE: Filming Requirements / Facility Visit

[REDACTED],

Thanks for getting back to me. It was very helpful. My comments are in line:

1. No, from our perspective, you do not need to have any additional authorisations to film your aircraft – **Excellent. Thanks for the clarification.**
2. Yes, we would still be interested in visiting your test site (we were of course originally planning to visit on 1 Jun anyway). If a visit can be combined with the filming of your video, then this would be fine, but we would not want you to start basing the timing of your filming activities around us – if we can make it on the specified date, then fine. If not, perhaps we can look to scheduling a visit at another time? Do you have a planned date for the filming yet? It would be a similar group from the CAA as we planned last time (plus a couple of new people too). I've also had a request from a member of our Air Accident Investigation Branch (UK equivalent of the NTSB) to visit too if possible? He would obviously be kept under strict confidentiality rules too. – **At this time we don't have a date set in stone for filming but looks like it will be sometime in mid-October (12th – 14th). In terms of attendance I would anticipate a similar group as was previously agreed. If you could provide an updated list of potential attendees available between October 12th – 14th, I'll start organizing the visit. In terms of AAIB attendance let me vet this through the appropriate channels.**
3. Regarding your [REDACTED], we hope to get the exemption completed and back to you very soon. We just need [REDACTED] to find a bit of spare time this week to make a final check from his perspective – **Thanks for the update. Ill follow-up next week. Please don't hesitate to contact me if the team has any comments or questions.**

From: [REDACTED] [[mailto:\[REDACTED\]@caa.co.uk](mailto:[REDACTED]@caa.co.uk)]

Sent: Wednesday, August 24, 2016 10:42 AM

To: [REDACTED] <[\[REDACTED\]@amazon.co.uk](mailto:[REDACTED]@amazon.co.uk)>; [REDACTED] <[\[REDACTED\]@caa.co.uk](mailto:[REDACTED]@caa.co.uk)>

Cc: [REDACTED] <[\[REDACTED\]@caa.co.uk](mailto:[REDACTED]@caa.co.uk)>

Subject: 20160824-RE: Filming Requirements / Facility Visit

Hi [REDACTED],

Thanks for your message, [REDACTED] is a bit busy at the moment with other stuff so I'll reply instead – regarding your questions:

1. No, from our perspective, you do not need to have any additional authorisations to film your aircraft
2. Yes, we would still be interested in visiting your test site (we were of course originally planning to visit on 1 Jun anyway). If a visit can be combined with the filming of your video, then this would be fine, but we would not want you to start basing the timing of your filming activities around us – if we can make it on the specified date, then fine. If not, perhaps we can look to scheduling a visit at another time? Do you have a planned date for the filming yet? It would be a similar group from the CAA as we planned last time (plus a couple of new people too). I've also had a request from a member of our Air Accident Investigation Branch (UK equivalent of the NTSB) to visit too if possible? He would obviously be kept under strict confidentiality rules too.
3. Regarding your [REDACTED], we hope to get the exemption completed and back to you very soon. We just need [REDACTED] to find a bit of spare time this week to make a final check from his perspective

Hope that helps?

[REDACTED]
[REDACTED]
[REDACTED]

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W Sussex
RH6 0YR
Tel: [REDACTED]
E-mail: [REDACTED]@caa.co.uk

From: [REDACTED] [mailto:[REDACTED]@amazon.co.uk]
Sent: 23 August 2016 09:42
To: [REDACTED]
Cc: [REDACTED]
Subject: Filming Requirements / Facility Visit

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[REDACTED],

I hope you have been well. I have a couple of question I'm hoping you or your fellow colleges can assist with.

1. In the coming months we are planning on filing a promotional video for Prime Air, showcasing some of our technology and vehicles. This will be conducted within the confines of our currently approved flight space. With respect to approvals do we need any special authorizations to film our vehicles for promotional use?
2. Would you and your team be interested in visiting our test site during the filming of this promotional video? This may be a good opportunity for you see our updated facility and preview our daily operational workflow.
3. Do you have an update on our recent EVLOS [REDACTED] submission? There was an unfortunate mix up relating to payment that resulted in a substantial delay. Any updates would be helpful on our end.

Thank you in advance for the help. Look forward to syncing up.

[REDACTED] | [REDACTED]
Mobile – [REDACTED]
Office – [REDACTED]



“Don't confuse motion with action” – B. Franklin

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