

April 24, 2015
Docket Operations, M-30
U.S. Department of Transportation
1200 New Jersey Avenue SE.
West Building Ground Floor, Room W12-140
Washington, DC 20590-0001

Re: Docket ID- FAA-2015-0150-0017
Operation and Certification of Small Unmanned Aircraft Systems

Dear Sir or Madam:

The undersigned organizations represent a broad spectrum of agricultural stakeholders. We support the use of unmanned aircraft systems (UAS) as a tool for farmers and ranchers to help manage their crops and livestock and make more informed business decisions. Agriculture will benefit greatly from UAS on many levels, and many consider it to be the leading industry to experience positive economic and environmental impacts from this technology. It is timely that the Federal Aviation Administration (FAA) is seeking to integrate commercial UAS into our national airspace, and we appreciate the opportunity to comment on the Operation and Certification of Small Unmanned Aircraft Systems proposed rule.

American farmers and ranchers are known to embrace new technologies to meet new challenges and demands. Today they implement ever-evolving precision agricultural techniques to make management decisions. Precision agriculture is the collection, analysis, and use of agronomic data to influence more precise and accurate applications of agricultural inputs. Agronomic data such as nutrient levels and crop stress help determine exact locations and amounts of inputs needed to maintain plant health. These practices further sustainability efforts as operating costs and input levels decline, yields are maximized, and environmental impacts are lessened.

UAS are a tool for farmers and ranchers to increase efficiency and sustainability. Immediate uses for agriculture are crop scouting, field mapping and livestock monitoring. UAS have the potential to exponentially decrease the time it takes to complete these jobs while providing better perspective and faster feedback than many current methods. The ability to use this technology for early detection of pest infestations, weed emergence, and nutrient shortages will greatly increase the likelihood of catching threats before they develop into catastrophes. This is great news for farmers, ranchers, consumers and the environment.

We encourage the FAA to continue seeking input from the agriculture sector throughout the rulemaking process, as it is one industry that offers low risk and high reward potential for this emerging technology. We thank the FAA for addressing the commercialization of UAS and encourage you to look to the potential the technology has for agriculture as you develop the final rule.

Sincerely,

American Farm Bureau Federation®
American Soybean Association
Nation Association of Wheat Growers
National Corn Growers Association
National Cotton Council
National Farmers Union
USA Rice Federation