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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 No. FAA-2015-0150; Operation and Certification of Small Unmanned Aircraft Systems; Proposed Rule, 80 Fed. Reg. 9544 (Feb. 23, 2015)

Dear Administrator Huerta:

CropLife America and Responsible Industry for a Sound Environment (RISE) (collectively CLA) appreciate the opportunity to review and comment on the Federal Aviation Administration (FAA)'s proposed rule on the Operation and Certification of Small Unmanned Aircraft Systems, 80 Fed. Reg. 9544 (Feb. 23, 2015). CropLife America is the national voice of the agricultural crop protection industry, representing companies that develop, manufacture, formulate and distribute virtually all of the crop protection, pest management and biotechnology products used by American farmers. RISE represents companies that develop, manufacture, formulate and distribute non-agricultural and human health pest control solutions. Some of CLA's members also provide aerial pest control services. Because small unmanned aircraft systems (UAS) are anticipated to be used commercially in agriculture, crop sensing and pest control, CLA is interested in the safe and effective integration of UAS into the national airspace. CLA supports FAA's proposal to establish a regulatory framework for commercial UAS operations. These comments propose some additional recommendations to enhance public safety.

CLA appreciates FAA's efforts to balance the broad range of interests and issues at stake in regulating UAS. Given that other countries and U.S. trading partners have already established regulatory frameworks for the commercial use of UAS, a safe and effective regulatory framework in the U.S. is important to allow industries like agriculture to remain competitive on a global scale.

The potential economic benefits to agriculture are many. When equipped with cameras and sensors, UAS can gather data that can add significant value and environmental stewardship benefits to efficient agricultural production and pest control through crop sensing, aerial imaging and precision agriculture. For example, multispectral cameras can capture raw photographs, infrared images and Normalized Difference Vegetative Index images that can provide useful data and insights for growers adopting precision agriculture techniques. This proposed rule demonstrates a well-balanced effort by FAA to safely integrate UAS into the national airspace, allowing for many economic benefits to accrue to industries like agriculture. CLA is confident

Representing the Crop Protection Industry

1156 15th St. N.W., Suite 400 Washington, D.C. 20005 • 202.296.1585 phone 202.463.0474 fax www.croplifeamerica.org

that UAS can be used safely in industries, including agriculture, with the adoption of the recommendations set forth below.

CLA believes that small UAS to be regulated under this proposed rule need to be identifiable, visible and safely operated while in the vicinity of agricultural aviators, given that both aircraft would operate in the national airspace below 500 feet. Specifically, CLA supports the following recommendations as amendments to this proposed rule.

CLA supports the following safety recommendations as to the UAS aircraft that will be operating in the national airspace system:

- UAS should be equipped with strobe lights;
- UAS should be coated in a highly visible color(s) markedly contrasted from the surrounding airspace and ground;
- Once determined to be effective and commercially practical by FAA, UAS should be equipped with “sense and avoid” technology;
- UAS should be properly maintained; and
- UAS should have a registered N-number on an indestructible and unmovable plate attached to the UAS for identification in case of an accident or incident.

CLA supports the following recommendations regarding the operation of UAS in the national airspace system:

- UAS operators should give the right of way to all manned aircraft;
- UAS operators should be required to attend and monitor their UAS at all times, be attentive to their surroundings and be free from distractions;
- UAS operators should be trained and equipped with an aviation radio set to a locally defined frequency to account for various areas;
- UAS operators should be well-versed in the UAS operator manual; and
- UAS operators should ensure that a Notice to Airmen is issued 48-72 hours in advance of an operation.

CLA appreciates FAA’s consideration of these recommendations. Should you have any questions or comments, please contact Rachel Lattimore directly at RLattimore@croplifeamerica.org or (202) 872-3895.

Regards,



Rachel G. Lattimore, Esq.
Senior Vice President, General Counsel & Secretary
CropLife America