



NAICC Comments to FAA--Operation and Certification of Small Unmanned Aircraft Systems (sUAS)

The National Alliance of Independent Crop Consultants (NAICC) appreciates the opportunity to comment on the Federal Aviation Administration's (FAA) proposed rule related to the adoption of specific rules to allow the operation of small unmanned aircraft systems in the National Airspace System. Furthermore, NAICC believes that any decision related to this topic should be based on sound science, should reflect input from practitioners such as NAICC members whose work will be a valuable asset to the use of UAVs on a daily basis.

NAICC is a national organization representing more than 700 crop consultants, contract researchers and quality assurance professionals across the country. Our members are experts in crop care, integrated pest management (IPM), integrated crop management, and contract research as well as applications in biotechnology and sustainable agriculture. Our crop consultant members are truly independent in that they do not sell any products nor do they receive any commission from the products they recommend. Independent crop consultants receive their income by providing services directly to the grower.

Independent crop consultants utilize the principles of Precision Ag and IPM in their decision making process when recommending product or action being taken by the grower. Our consultants strive to utilize products that will have the least impact on the environment while providing economic control of a particular problem. Our members consider the impact of their recommendations on the growers' crop and the environment, as well as on the growers' bottom line.

Crop consultants and research consultants are very interested in UAV's and their potential use in agriculture. UAV's can be outfitted with cameras that can gather a wide array of data that is useful to the clients we serve. This data varies from infrared photography that can reveal differences in crop growth and health to collecting topography information from fields. Furthermore, these cameras can provide such high quality images that differences in crop emergence can be detailed in these images. Many consultants believe that this technology can be used to greatly improve scouting efficiency by identifying problem areas of fields and thus focusing scouting on these areas. No doubt there is an infinite array of possibilities on how our members could use this technology.

While there are so many potential positive aspects of UAV's in agriculture, there are also many concerns as well. Our friends in the ag aviation business see these as potential obstacles and hazards. Of course there is also concern over privacy issues as well. However, we feel that these are concerns that can be overcome and UAV's can be successfully used by our members.

We welcome comments or requests for additional information to support our positions.

Respectfully Submitted,

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