



April 20, 2015

National Telecommunications and Information Administration
U.S. Department of Commerce
1401 Constitution Avenue NW, Room 4725
Attn: UAS RFC 2015
Washington, DC 20230
UASrfc2015@ntia.doc.gov

RE: Privacy, Transparency, and Accountability Regarding Commercial and Private Use of Unmanned Aircraft Systems, Docket No. 150224183-5183-01

Dear Sir or Madam:

On behalf of the National Corn Growers Association (NCGA), the following comments are being submitted regarding the Federal Register notice and request for comment on Privacy, Transparency, and Accountability Regarding Commercial and Private Use of Unmanned Aircraft Systems. We thank the National Telecommunications and Information Administration (NTIA) for addressing these important issues as they relate to the integration of commercial Unmanned Aircraft Systems (UAS) and appreciate the opportunity to comment.

NCGA represents more than 42,000 dues-paying corn grower members and the interests of more than 300,000 farmers who contribute through corn checkoff programs in their states. Our members strongly support the use of Unmanned Aircraft Systems (UAS) technology as a tool for farmers to manage their farm operations for both production and research. UAS figures to improve the efficiency and safety of many industries and farming is recognized as one sector that will benefit greatly. We thank the NTIA for recognizing this and highlighting farm management in their request for public comment.

We have entered an era known as precision agriculture: a practice that utilizes remote sensors and imagery equipment to collect agronomic data to better analyze soil, plants and fields, and thus make more informed operational and crop management decisions. The agronomic data, or farm data, helps farmers spot irregularities in their crops like pest infestations, crop disease, and input needs which can influence the precise application of fertilizer, lime, pesticides, water, and other inputs. These more precise decisions lead to a myriad of benefits for both farmers and consumers that include: lower farming costs, fewer inputs, higher yields, and a reduced environmental impact. UAS is a complementary tool that will further sustainable farming practices while positively impacting the farm economy and the environment.

While the collection and analysis of farm data has the potential to benefit farmers and farming, it does not come without concerns and challenges about data ownership and privacy. Many questions surround farm data collection which is why NCGA has worked with other farm organizations and Ag Tech Providers

(ATPs) to provide clarity and address confusion. In November 2014, this group published a document titled "Privacy and Security Principles for Farm Data" that serves as guiding principles for how data should be handled in the farm industry. This document highlights NCGA's position that farmers own all information generated on their farming operations.

We consider farm data to be to be proprietary information that is sensitive to a farmer's business and way of life. Any use of UAS, whether commercial, private, or governmental, over a farmer's land that results in data collection should come with explicit consent from the farmer. Any data collected from the farm must remain within the bounds of any agreed upon contract if such commercial services were rendered. We are opposed to any of these entities using UAS over farms to collect information on a farmer's operation without explicit permission. The proprietary information collected could be used in ways that would negatively impact the farmer. These unauthorized uses of farm data range from speculation in the commodity market to abuse by citizen activist groups. Any farm data retrieved by UAS by a government agency whether, purposeful or incidental, should not be used against the farmer in any way.

NCGA is in favor of what the NTIA is calling transparent operation of UAS. Farmers want to use this technology to help their operations and become more efficient, but we acknowledge that not all entities will use UAS responsibly. To help mitigate the concern of unauthorized use and data collection over a farmer's land, NTIA should take steps to identify those responsible for abusing privacy with UAS: identifying entities that own or operate particular UAS, the purpose for which UAS will be used, and information about any data practices implemented by the user. UAS should also be easily identifiable, perhaps with a personal user identification number, and a mechanism should be in place so that any observed wrongdoing can be reported and traced back to the owner. UAS users also must be held accountable. UAS privacy best practices should be outlined through UAS training programs, model aircraft clubs, and other avenues that UAS operators are associated with. These transparent practices, coupled with measures in accountability, can go a long way in ensuring that privacy isn't abused by UAS.

UAS technology has clear benefits in agriculture and farmers are excited to experience the value that it can bring to their operations. Steps must be taken, however, in educating users across all industries, government agencies, and recreational clubs to ensure a certain level of privacy and respect for property exists. We thank the NTIA for taking initial steps in address privacy best practices for UAS and look forward to participating in the process.

NCGA appreciates the opportunity to submit comments on this important matter.

Sincerely,

A handwritten signature in cursive script that reads "Chip Bowling". The signature is written in black ink and is positioned above the typed name and title.

Chip Bowling
President
National Corn Growers Association