



March 2, 2020

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

Re: Comments on Docket Number FAA-2019-1100

Dear Federal Aviation Administration:

The Agricultural Retailers Association (ARA) is a not-for-profit trade association that represents America's agricultural retailers and distributors. ARA members provide goods and services to farmers and ranchers which include: fertilizer, crop protection chemicals, seed, crop scouting, soil testing, custom application of pesticides and fertilizers, and development of comprehensive nutrient management plans. Retail and distribution facilities are scattered throughout all 50 states and range in size from small family-held businesses or farmer cooperatives to large companies with multiple outlets.

ARA has read the notice of proposed rulemaking regarding Remote ID and recommends the Federal Aviation Administration (FAA) reconsider its proposal for remote identification of unmanned aircraft systems. While ARA agrees that safety and security should be paramount when piloting drones and agree with the importance of tracking unmanned aircraft systems (UAS), this proposed rule as it stands would require an internet connection that may be unavailable or exist in unserved areas in parts of rural America.

Agriculture use of drones for crop production is an important tool that has become routine practice. The FAA proposal that relies on the internet for signals in very remote areas of the country would not be productive because many areas of the country do not have an internet signal or even access opportunities to high-speed broadband.

Rather, the FAA should focus on a broadcast system which would keep most areas of the country economically feasible for current drone technology and operation in remote areas of agriculture production.

Thank you for consideration of our comments.

Sincerely,

Hunter Carpenter
Director of Public Policy
Agricultural Retailers Association