



April 10, 2015

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 Iowa Corn Growers Association (ICGA), thank you for the opportunity to respond to the Federal Register notice soliciting comment on the Privacy, Transparency, and Accountability Regarding Commercial and Private Use of Unmanned Aircraft Systems (UAS), Docket No. 150224183–5183–01. I appreciate the opportunity to comment on the use and privacy concerns of UAS systems as this is a critical issue for farmers and will affect America's agriculture economy.

ICGA and its elected board of directors represent nearly 8000 dues paying members that work to build relationships with business and industry. We target everyday issues that directly affect the corn grower's livelihood. ICGA's mission is to create opportunities for long-term Iowa corn grower profitability.

UASs provide an additional platform to collect data for farm operations such as yield potential and crop growth conditions than is possible from manned aircraft. The UAS system can travel at slower speeds, maneuver in smaller, more difficult areas and fly closer to the subject matter. This technology brings with it a wealth of potential information and opportunity. However, it does not come without its challenges. Because of this, UAS should require a different level of requirements regarding their use and data collected from them as it relates to privacy and transparency compared to manned aircraft.

Use of UAS over a farmer's land should only be allowed when the farmer grants permission to or hires a UAS operator to operate over their land, within the limits of the agreed-upon purpose of the flights. This should include both land and property that the farmer both owns and operates including leased ground. The data collected by the UAS operator should remain the sole property of the farmer and the UAS operator and only used under the agreed-upon purpose initially outlined. In addition, if a farmer owns their own UAS system, any data collected should remain the sole property of that farmer.

If an operator owned UAS is being used to conduct work over a farmer's property with their permission, the identity of the UAS should be clearly visible and should be traceable to the operator. This will also help farmers to determine who owns the UAS should a UAS fly over private land without permission.

Farmers would not want other individual citizens, companies or governmental agencies to fly UAS over their property for the purpose of obtaining information relating to the condition and operation of their farm. This type of information could be used by or sold to other entities or made public against the will of and to the detriment of the farmer. No third party should be allowed, without farmer permission, to collect any type of data from farmers' land with a UAS.

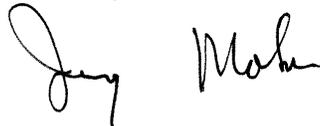
Farmers are opposed to individuals, companies or government agencies flying their UAS over farmer land to gain access to some other property as this would be viewed as a form of trespassing. It would be unknown to the farmer whether any data were being collected as a UAS is passing over their land to get to another location to be used for purposes to the detriment of the farmer.

We recognize that state and local governments may also find value in using UAS for designated governmental purposes such as surveying roads, managing public lands, or monitoring water flows along our nation's rivers. However, any data incidentally collected by any government agency regarding private property, must not be used for regulatory purposes against farmers and must not be able to be obtained by outside parties under a Freedom of Information (FOIA) request.

To regulate the unauthorized use of UAS, ICGA supports the centralization of a UAS registration authority (similar to state Departments of Transportation) that would retain all information related to the ownership and identification information required on each UAS. If a farmer believes they have been trespassed against or that a UAS has damaged private property, this registration authority would be the governing body to determine who the operator of the UAS was.

On behalf of Iowa's corn farmers, thank you for consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Jerry Mohr". The signature is written in a cursive, flowing style.

Jerry Mohr
President
Iowa Corn Growers Association