



## TENNESSEE FARM BUREAU FEDERATION

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October 2, 2025

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

**Re: Docket No. FAA-2025-1908; Notice No. 25-07; Normalizing Unmanned Aircraft Systems Beyond Visual Line of Sight Operations**

The Tennessee Farm Bureau Federation (TFBF) appreciates the opportunity to provide comments regarding the notice of proposed rulemaking (NPRM) titled *Normalizing Unmanned Aircraft Systems Beyond Visual Line of Sight Operations*. With over 690,000 members, TFBF is the largest general farm organization in Tennessee, representing all types of commodity producers across the state. Our policy is developed by a grassroots network of farmer members who identify, research, deliberate, vote on, and adopt policies related to agriculture and rural living. We encourage the Federal Aviation Administration (FAA) to consider these comments.

Farming, like every other industry, is constantly changing and adapting to improve efficiency. To do more with less, farmers are increasingly adopting new technologies on their farms to meet the growing demand for higher yields on fewer acres and with less labor. Technological improvements can be found at every step of the production agriculture chain and enhance the efficiency of a farming operation. Specifically, farmers are relying on unmanned aircraft systems (UAS), or drones, to aid in aerial seeding, dusting, spraying, fertilizing, crop improvement, and pest control. UAS have become a critical tool to maintain productivity while reducing input costs.

In this NPRM, the FAA is proposing regulations to enable the design and operation of UAS at low altitudes beyond visual line of sight. TFBF appreciates FAA's recognition of the importance of UAS on farms and appreciates the opportunity to provide feedback on the impact of these proposals on farms across the country.

FAA proposes requiring farms to receive permits or certifications based on a series of criteria including number of aircraft used, population density near the farm, weight of the UAS, size and scale of the operation, and others. Based on these criteria, farmers either

must obtain a permit or receive a certification before using UAS on their farm. The process to obtain a permit must be flexible enough to account for the diverse types of farms across the country and concise, streamlined, timely, and easy-to-understand to allow for quick response times and the unpredictable nature of farming.

In a general sense, farmers understand and are willing to comply with sensible requirements for safe use of technologies. However, FAA must be keenly aware of the numerous regulations across many different federal agencies that farmers already have to comply with today. When proposing additional regulations on an already highly regulated industry, FAA must acknowledge where they reasonably have authority to impose regulations and where this authority already exists within another federal agency. For example, it is not within FAA's scope of authority to regulate spraying of crop protection products from drones; that falls within the Environmental Protection Agency's scope. Additionally, the burden to determine safety of a crop protection tool or other substance used on a farm should not be within the UAS operator's responsibility if the product is used according to its label, since EPA already regulates those products.

FAA is also proposing restrictions on where UAS can be used to dispense materials based on the population density around the operation. This is impractical due to increased urban sprawl happening across Tennessee. More farming operations are in higher population density areas, and requiring increased permitting based on population density criteria will require more farmers to get a permit and increase the workload of FAA to maintain those permits. We encourage FAA to reconsider these criteria.

Farmers continue to embrace new technologies to improve production practices, increase yields, and reduce operating costs. As UAS become more commonplace across agriculture, we encourage FAA to adopt reasonable certification and safety training requirements for the operation of UAS to ensure the highest and best use of emerging technology. Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Eric Mayberry".

Eric Mayberry

President

Tennessee Farm Bureau Federation