Michigan Agri-Business Association

October 6, 2025

RE: Comments of the Michigan Agri-Business Association (MABA) on Proposed Rulemaking *Normalizing Unmanned Aircraft Systems Beyond Visual Line of Sight (BVLOS) Operations, FAA–2025–1908*

I am writing on behalf of the Michigan Agri-Business Association (MABA), a nonprofit trade association representing more than 300 member businesses across Michigan's agricultural value chain. Our members include grain handlers, agricultural retailers, logistics providers and beyond. Many of these member businesses are on the front lines of agricultural innovation, and a growing number are involved in agricultural drone operations. Most of these operations involve the use of drones for a) aerial imaging and b) in-field applications of crop inputs.

MABA appreciates the opportunity to comment on the FAA's August 7, 2025 proposal on BVLOS operations of unmanned aircraft. This is an important rulemaking for our industry, which is one of the fastest-growing and most unique sectors for drone use. While many agricultural operations do not require BVLOS parameters, we strongly support the overall goal of the FAA's proposal and appreciate the administration's forward-looking approach to drone use. The rulemaking is a chance to address a range of challenges faced by agricultural users. We urge FAA to consider ways the final rule can align with the unique operational realities of agriculture.

MABA Supports Expanded BVLOS Opportunities

Although most agricultural drone operations remain within visual line of sight, we support the overall direction of the FAA's proposal to expand BVLOS opportunities. Certain imaging and NDVI flights, which are critical to modern precision agriculture, stand to benefit significantly from expanded BVLOS authority. These flights help farmers map field variability, diagnose crop issues and target resources efficiently. Even for operations within line of sight, we view this rulemaking as an opportunity to accelerate and accommodate the fast-evolving role of drones in agriculture. We appreciate that FAA is positioning itself to keep pace with ongoing innovation in the drone industry. Our members see new technologies every year in agriculture, from spray drones with higher payload capacities to improved data platforms integrating drone imagery with farm management software. Regulatory flexibility will be essential to allow these technologies to mature and provide value to agriculture.

We Urge FAA to Streamline Paperwork and Registration Approvals

While we recognize the FAA's ongoing efforts to streamline operations, paperwork and approval timelines remain among the most significant barriers for agricultural operators here in Michigan. The outdated processes in place now create unnecessary delays and put compliant operators at a disadvantage relative to those who disregard applicable law and regulation.

For example, the wait time for FAA aircraft registration (obtaining an N number for aircraft under Part 47) can stretch for months. Obtaining Part 137 operating certificates for aerial application has taken our members several months in some cases. These timelines discourage investment and slow down innovation. And again, for our member companies following the correct process, they may be "outrun" by a user not in compliance with regulation. The FAA should recognize this dynamic and adopt measures that reduce paperwork and speed approvals for agricultural operations.

Specifically, FAA should provide streamlined pathways for non-fixed-wing aircraft registration. Agricultural spray drone operations differ fundamentally from fixed-wing aircraft operations. However today, registering an over-55-pound drone can be as burdensome as registering a fixed-wing aircraft. The requirement to use Part 47 registration for many agricultural drones, complete with N numbers designed for traditional aircraft, is poorly suited to our sector. Some drones used in agriculture do not last for an extended period of time, yet each requires an N number. At the current rate, this risks exhausting available numbers and it creates a needless burden for agricultural users. By contrast, drones under 55 pounds are registered under Part 48, a far more efficient process. This could be applied more broadly. We urge FAA to expand exemptions from aircraft registration for agricultural UAVs, or at minimum, provide a streamlined registration pathway for drones over 55 pounds.

NOTAM Filing Should Not Be Required for Short, Low-Altitude Agricultural Flights

Another critical area of reform involves Notice to Airmen (NOTAM) requirements. Current rules require NOTAMs even for very short, local, low-altitude operations that remain within visual line of sight, the type of flights that dominate agricultural use. Filing NOTAMs in these cases adds unnecessary delays and offers no functional safety benefit.

In agriculture, operations are often scheduled “last minute” by necessity. Weather (precipitation, wind speed and more), crop conditions, and pest pressure dictate when flights must occur. Requiring operators to file a NOTAM no more than 72 hours and no less than 24 hours in advance is unworkable. This rigidity disadvantages compliant operators who follow the rules and incentivizes noncompliant operators to seek a competitive advantage by flouting the flight plan rules.

Direct communication methods, such as coordination with local ATC where relevant, are far more effective for agricultural operators than a rigid NOTAM schedule. FAA should reduce or eliminate NOTAM requirements for short, local agricultural flights, or create a more flexible mechanism that reflects agricultural realities.

FAA Should Take Care to Avoid New Bureaucratic Burdens

As this rulemaking moves ahead and, we hope, results in streamlined processes, we urge the Agency to take care against trading existing bureaucratic burdens for new ones. Specifically, we are concerned expanded reporting requirements would overwhelm small businesses with limited administrative staff. Proposed density limits for drone operations could significantly impair agriculture in Michigan, where multiple operators may need to fly in proximity during peak season, causing compliance challenges even in highly rural areas. We urge FAA to consider agricultural exemptions or flexibility to avoid unintended consequences.

Emphasizing Agriculture’s Unique Use Cases

Overall, we encourage FAA to seize this opportunity to make a difference for the agricultural industry, and consider some of the unique elements affecting agricultural applicaton. Our members operate in rural and sparsely populated areas, often over privately-owned farmland. Flights are typically short, local, and repeated many times in a day. These are extremely safe, low risk operations as compared to those on, for example, urban package delivery routes.

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For agriculture, drones are tools to enhance efficiency, streamline the use of inputs, improve sustainability and help farmers improve their ROI. The final rule must reflect this distinction by recognizing that many agricultural flights do not require BVLOS but benefit from streamlined processes, and allowing operational flexibility.

MABA thanks FAA for its thoughtful approach to BVLOS and drone integration. We share the administration's commitment to forward-thinking regulation, and we recognize the importance of ensuring safety as drone use expands. The final rule should reflect agriculture's unique operational realities as outlined above. FAA has a promising opportunity to ensure that agricultural operators who strive to comply with the law are supported rather than penalized, and that agriculture remains a strong partner in the safe integration of drones into the national airspace.

Thank you for considering our comments from the Michigan agricultural industry.

Sincerely,

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