



Ben Walsh
 Flight Technologies and Procedures Division
 Federal Aviation Administration
 470 L'Enfant Plaza SW Suite 4102
 Washington DC, 20024

March 2, 2020

Docket Number: FAA-2019-1100
 Remote Identification of Unmanned Aircraft Systems

Dear Mr. Walsh,

NASF represents the directors of the state forestry agencies in all 50 states, eight territories, and the District of Columbia. State Foresters deliver technical and financial assistance, along with protection of forest health, water and wildfire for more than two-thirds of the nation's forests. While the duties of state agencies vary from state to state, all share common forest management and protection missions and most have statutory responsibilities to provide wildland fire protection on all lands, public and private.

Along with our federal partners at the USDA Forest Service and Department of Interior, state and local firefighting agencies work together in an interagency effort to prevent, mitigate, and suppress wildfires through the Cohesive Strategy. In addition to being responsible for wildfire protection on 1.52 billion acres of forests, range, and grasslands, 6,026 out of the 8,080 state personnel mobilized through the National Interagency Coordination Center in 2018 were sent to respond to wildfires burning on federal lands.

NASF supports the Federal Aviation Administration proposed rule on remote identification of Unmanned Aerial Systems (UAS) due to the enhanced safety and risk reduction that remote identification will bring during wildfire suppression operations. We were pleased to see the proposed rule recognizes the dangers posed to firefighters, pilots, and to life and property by unauthorized unmanned aircraft incursions into aerial wildland firefighting operations.

In 2019 the States responded to and reported over 39,000 wildfires that burned 1.8 million acres. Three hundred and forty-one of these fires were large fires that required extended time frames for containment and control. UAS were used effectively and efficiently on many of these wildfires by emergency response agencies. Utilization of UAS continues to expand in this arena.

Executive Director
 Jay Farrell

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Many of the UAS currently operated by the State Forestry Agencies in support of wildland fire suppression may not have the capability to provide remote identification. Granting an extension to, or “grandfathering-in” existing UAS operated by emergency response agencies in wildfire suppression efforts may be warranted for public safety reasons until software can be developed to support this proposed change. As such, NASF requests that the FAA provide an exemption in the final rule for UAS currently operated by emergency response agencies.

Thank you for the opportunity to provide feedback and for your consideration of our comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Gregory J. Josten". The signature is fluid and cursive, with a prominent initial "G" and a long, sweeping underline.

Greg Josten
NASF President
South Dakota State Forester