

July 6 ,2026

U.S. Department of Transportation
Federal Aviation Administration
800 Independence Ave. S.W.
Washington, DC 20591

Re: Docket No. FAA-2026-4558; Notice No. 26-03; Designation—Restrict the Operation of Unmanned Aircraft in Close Proximity to a Fixed Site Facility

To whom it may concern.

Attached you will find comments on the Federal Aviation Administration's (FAA) proposed rule "Designation-Restrict the Operation of Unmanned Aircraft in Close Proximity to a Fixed Site Facility" published in the Federal Register on May 6, 2026, by the Federal Aviation Administration (FAA).

We appreciate the opportunity to provide comments on this proposed rule. If you should have any questions about our comments or need additional information, please contact Paul Bredwell at 678-514-1973 or via email at pbredwell@uspoultry.org.

Sincerely,

U.S. Poultry & Egg Association

Introduction

US Poultry & Egg Association (USPOULTRY) is the world's largest and most active poultry organization. Membership includes producers and processors of broilers, turkeys, ducks, eggs, and breeding stock, as well as allied companies. Formed in 1947, the association has affiliations in 26 states and member companies worldwide.

The U.S. Poultry & Egg Association is writing to formally submit comments regarding the Federal Aviation Administration's (FAA) proposed rule to restrict unmanned aircraft systems (UAS) operations over critical fixed-site infrastructure. We strongly urge the FAA to explicitly include commercial poultry and egg production facilities under the definitions of protected critical infrastructure. Restricting unauthorized drone flights around these farms is vital to maintaining strict on-farm biosecurity and defending the national food supply.

Threat to Strict Biosecurity and Disease Mitigation

Commercial poultry operations operate under intense biosecurity protocols designed by industry and the USDA Animal and Plant Health Inspection Service (APHIS) to prevent the introduction of devastating pathogens. Low-flying, unauthorized UAS present a multi-faceted biosecurity threat to these sensitive ecosystems:

- **Fomite and Cross-Contamination Vector:** Drones that move between different areas or properties can act as mechanical vectors (fomites). They risk transporting microscopic viral particles on their hulls and propellers directly onto clean farm perimeters.
- **Disruption of Wildlife Barriers:** Highly Pathogenic Avian Influenza (HPAI), Newcastle Disease, and other zoological viruses are primarily carried by wild migratory waterfowl. Poultry facilities often use various practices to keep wild birds away from barns. Low-altitude drone operations can panic wild birds, flushing flocks of migratory waterfowl into immediate contact with poultry exhaust fans, feed lines, and facility structures.

Protection of National Food Security and Economic Stability

Food and agriculture are recognized as critical federal infrastructure sectors. A single positive detection of HPAI, Newcastle or numerous other diseases requires immediate responses. In the case of HPAI, mandatory depopulation of the entire facility's flock is required to contain the outbreak.

- **Market Devastation:** Outbreaks lead to localized shortages, skyrocketing consumer prices, and massive financial losses for producers.
- **Trade Impacts:** International trading partners frequently shut down borders to U.S. poultry products upon disease detection. This inflicts widespread damage on national economic security.

- **Supply Chain Vulnerability:** Protecting these localized manufacturing centers from external operational hazards is fundamentally a matter of national security.

Proposed Regulatory Solutions

To ensure the rule achieves its intended goal without placing an undue burden on the agriculture sector, we recommend the FAA integrate the following into the final rulemaking of 14 C.F.R. Part 74:

1. **Critical Infrastructure Status for Food Production:** Classify commercial egg-laying facilities, broiler farms, and turkey operations as high-risk, fixed-site facilities eligible for explicit flight restrictions.
2. **Standard Horizontal and Vertical Buffers:** Implement a mandatory minimum lateral and vertical buffer zone (e.g., 400 feet) around the physical boundaries of animal housing facilities.
3. **Strict Operator Exceptions:** Restrict airspace exceptions exclusively to agricultural drones operated by the farm owner, contracted operators with clear written authorization, or emergency government response teams.

Conclusion

The poultry and egg industries appreciate that the Federal Aviation Administration has requested comments on restricting unmanned aircraft systems (UAS) operations over critical fixed-site infrastructure. Without question, commercial poultry and egg farms are critical infrastructure as they provide a wholesome, economical and more importantly reliable source of protein to the citizens of the United States. We thank the FAA for its proactive approach to handling the safety and security risks associated with integrating UAS into the national airspace. Protecting the biosecurity of our agricultural facilities is essential to keeping our national food supply resilient, safe, and stable.

Additionally, the proposed Rule's ability to protect these operations from intended and unintended consequences of disrupting the animal husbandry operations that take place on US poultry and egg operations is paramount to protecting the security of our nation's food supply.

The U.S. Poultry & Egg Association welcomes the opportunity to provide these comments and look forward to working with the FAA. If you have any questions regarding these comments or would like additional information, please contact Paul Bredwell at pbredwell@uspoultry.org.

Respectfully submitted,

U.S. Poultry & Egg Association