



United States Department of Agriculture
National Agricultural Statistics Service



April 7, 2026

James Hunter Poole
Executive Chairman and CEO
Obelisk Tech Systems Inc.

Dear Mr. Poole:

Thank you for your comments submitted on March 16, 2026, concerning the Objective Yield Surveys (OMB 0535-0088) and the Cotton Ginning Survey (OMB 0535-0220). We appreciate your engagement in the public comment process. NASS reviews all comments received under the Paperwork Reduction Act, and your submissions have been added to the official record. NASS has conducted—and continues to conduct—research involving precision agriculture data. A primary challenge is that most of this data is proprietary to technology providers and is not typically shared, which limits NASS's access for statistical purposes. Further challenges include technical inconsistencies between different data platforms and data accuracy, which can be affected by factors such as equipment calibration. NASS uses all available data sources to support its estimation programs, including information from USDA's Farm Service Agency (FSA) and Risk Management Agency (RMA). While these sources provide valuable supplemental information, they do not fully meet the methodological and timing requirements needed to support the wide array of NASS publications. Their availability often does not align with the release schedules of NASS reports, which limits opportunities to incorporate them. NASS currently uses satellite imagery as well, but its accuracy has not yet reached the level required to replace or match the precision of survey-based data.

At this time, NASS does not utilize drone technology in its estimation programs. This is due to both legal considerations and internal research indicating that the scope and scale of data collection needed for national agricultural statistics far exceed the practical capabilities of drone-based approaches.

NASS is committed to transparency and regularly publishes documents which provide detail on survey performance, statistical accuracy, and estimation approaches. The Objective Yield (OY) surveys are one key indicator considered by the Agricultural Statistics Board when establishing national crop estimates. OY surveys use an acreage-based, probability-proportional-to-size

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(PPS) sampling design. This approach produces a self-weighting sample of crop acres within each state, ensuring representativeness based on acreage rather than on the type or characteristics of respondents. Because sampling, weighting, and estimation rely entirely on crop acres and objective field measurements, categories such as large commercial operations or small/beginning farmers are not part of the survey design. Please see the NASS report titled [The Yield Forecasting Program of NASS](#), which provides a detailed and mathematical discussion of the yield forecasting and estimating program.

Respondent burden associated with the OY program arises only during the initial Form A interview, when operators verify acreage and provide planting and management details. All subsequent sample visits involve only enumerator-collected field measurements and do not require any additional respondent participation. As a result, respondent burden can be directly summarized from sample size information in the supporting tables, since each sampled field corresponds to one Form A interview with consistent and identical burden.

After reviewing your comments alongside internal program requirements, statistical methodology needs, and operational constraints, NASS has determined that the existing survey designs, methodologies, and burden estimates for these information collections remain appropriate for meeting statutory, operational, and statistical responsibilities. Therefore, NASS will continue operating these information collections as currently designed.

- Additional information on the Objective Yield Surveys methodology can be found at: [https://www.nass.usda.gov/Surveys/Guide to NASS Surveys/Objective Yield/index.php](https://www.nass.usda.gov/Surveys/Guide%20to%20NASS%20Surveys/Objective%20Yield/index.php).
- Additional information on the Cotton Ginning Survey methodology can be found at: [https://www.nass.usda.gov/Surveys/Guide to NASS Surveys/Cotton Ginnings/index.php](https://www.nass.usda.gov/Surveys/Guide%20to%20NASS%20Surveys/Cotton%20Ginnings/index.php)

Thank you again for your participation and for your interest in the work of the National Agricultural Statistics Service.

Sincerely,

Lance Honig
Chair, Agricultural Statistics Board
U.S. Department of Agriculture National Agricultural Statistics Service