



February 2, 2024

Henry Liu  
Director, Bureau of Competition  
Federal Trade Commission  
600 Pennsylvania Avenue, NW  
Washington, DC 20580

**RE: Federal Trade Commission “Petition for Rulemaking of PIRG and iFixit”; FTC-2023-0077;  
Federal Register Document Number 2023-28874**

Dear Director Liu:

On behalf of the more than 220,000 family farm and ranch families of National Farmers Union (NFU), we write in support of the petition for Section 5 Rulemaking Addressing Consumers’ Right to Repair.

Farmers are heavily reliant on equipment such as tractors, combines, and other tools to do their jobs. The digitization of these technologies has benefited farmers, but it has also resulted in significant repair challenges such as service delays and reduced options for repair due to the restrictions imposed by manufacturers. Paired with shrinking equipment dealership networks driven by corporate consolidation among farm equipment manufacturers, farmers have fewer repair options and report facing higher costs, as well as longer wait times for repair.

**NFU’s *Fairness for Farmers* Campaign and “Right to Repair”**

NFU is fighting for “Fairness for Farmers”<sup>1</sup> to address decades of industry consolidation in agriculture that has led to excessive costs for farm inputs, supply chain vulnerabilities, and the economic devastation of our communities. Other symptoms of this consolidation are increased equipment costs and reduced repair options for farm machinery. NFU’s grassroots, member

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<sup>1</sup> Learn more about NFU’s *Fairness for Farmers* campaign at <https://nfu.org/fairness-for-farmers/>

driven policy supports “Fair Repair and Right to Repair legislation that would allow farmers and independent mechanics access to diagnostic software, information, and other tools to repair modern equipment.”<sup>2</sup>

### **Why “Right to Repair” matters to farmers and rural communities**

With the increasing incorporation of advanced technology into production agriculture where repair of that technology is restricted, it has become increasingly difficult for farmers and ranchers to fix their own equipment. This hurts the economic bottom lines of producers and local repair shops alike. Major farm equipment manufacturers restrict repairs by requiring certain software and software tools to make repairs to their tractors and other farm equipment and by refusing to make these tools available to farmers or independent mechanics.<sup>3</sup>

Without access to the software and information needed to fix modern equipment, farmers rely on dealership technicians for many repairs. That can lead to service delays, putting a farmer’s crop and livelihood at risk by impinging on their ability to operate during tight planting or harvesting windows. Farmers Union members have also told us they have been facing higher repair costs, a major challenge for farmers who often operate on thin margins.<sup>4</sup>

When we surveyed farmers, 92 percent told us they believe they could reduce their costs if they had better access to independent repair or could make all repairs themselves.<sup>5</sup> Additionally, analysis conducted by PIRG found that if farmers had the right to repair, this could save U.S. farmers as much as \$4.2 billion per year when direct costs and tractor downtime are both accounted for.<sup>6</sup>

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<sup>2</sup> National Farmers Union, *Policy of the National Farmers Union*, (March 2023).

<sup>3</sup> Some manufacturers have made limited tools, such as John Deere’s Customer Service ADVISOR, available for public purchase. These tools, however, have limited use—they do not provide information required to diagnose all problems with a tractor, nor do they enable a farmer to digitally approve all repairs once they have been made. Farmers still need to turn to the dealership for many repairs.

<sup>4</sup> An independent technician told *Reuters* he often gets calls from former customers that complain of being overcharged as much as \$10,000 for repairs. Repair restrictions can prevent independent technicians from providing competitive services. See <https://www.reuters.com/markets/us/fewer-us-tractor-dealerships-raise-costs-farmers-sector-consolidates-2022-09-01/>.

<sup>5</sup> Kevin O’Reilly, “Why Farmers Need Right to Repair,” *U.S. PIRG Education Fund and National Farmers Union Report*, January 2022, <https://pirg.org/edfund/resources/why-farmers-need-right-to-repair/>.

<sup>6</sup> Kevin O’Reilly, “Service Obstructor: John Deere software restricts farm repair,” *U.S. PIRG Education Fund*, July 2023, <https://pirg.org/edfund/resources/john-deere-repair-software/>.

Just two corporations manufacture nearly half of all tractors and other essential farm machinery in the United States.<sup>7</sup> Corporate consolidation among farm equipment manufacturers has contributed to consolidation among farm equipment dealers, which is further exacerbating the problems farmers face accessing repair.<sup>8</sup> Sixty-five percent of respondents to our survey reported having access to fewer dealerships than they did five years ago.<sup>9</sup> John Deere, which controls more than 50 percent of the large tractor market, has the most consolidated dealership network. As a result, there is approximately one John Deere dealership chain for every 12,000 farms and every 5 million acres of American farmland.<sup>10</sup>

This consolidation not only hurts farmers, it impacts small rural businesses that sell and repair agricultural equipment. Independent repair shops cannot complete all repairs without access to repair software tools and information, meaning they cannot fully compete with manufacturer-branded dealerships and their technicians. These factors make it more difficult for small business owners to provide needed services to their communities and help maintain the vibrancy of small towns.

Finally, farmers and rural residents rely on many of the same consumer devices as people living in urban and suburban areas, but they face unequal and less convenient access to certified repair options. Farms and rural communities are typically located long distances from authorized service centers, leading to diminished and more costly repair opportunities.

### **Farm equipment manufacturers and dealers have made false and misleading claims about independent farm equipment repair**

Underscoring the need for rulemaking to ensure consumers' right to repair, farm equipment manufacturers and dealers that oppose the right to repair have wrongly claimed that independent repair undermines emissions compliance laws under the Clean Air Act (CAA). To address these claims, NFU wrote the U.S. Environmental Protection Agency (EPA) in June 2023 requesting clarification of what the CAA requires. In August 2023, EPA Administrator Regan

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<sup>7</sup> Claire Kelloway and Sarah Miller, "Food and Powe: Addressing monopolization in America's food system," *Open Markets Institute*, September 2021, <https://www.openmarketsinstitute.org/publications/food-power-addressing-monopolization-americas-food-system>.

<sup>8</sup> Bianca Flowers, "Fewer U.S. tractor dealerships raise costs for farmers as sector consolidates," *Reuters*, September 1, 2022, <https://www.reuters.com/markets/us/fewer-us-tractor-dealerships-raise-costs-farmers-sector-consolidates-2022-09-01/>.

<sup>9</sup> Kevin O'Reilly, "Deere in the Headlights II," *U.S. PIRG Report*, February 2022, <https://pirg.org/resources/deere-in-the-headlights-ii-2/>.

<sup>10</sup> Ibid.

replied, expressing EPA’s support for independent repair, and refuting the claims made by manufacturers and dealers.<sup>11</sup>

NFU’s letter to the EPA, and EPA’s reply, are appended to this comment.

### **Agricultural “Right to Repair” and Support for FTC Act Section 5 Rulemaking**

NFU was pleased when the Federal Trade Commission (FTC) released a policy statement in July 2021 that it planned to ramp up law enforcement against illegal repair restrictions.<sup>12</sup> The next year, NFU, along with several state Farmers Union divisions and other organizations, filed a complaint with the FTC asking it to use its enforcement authority under Section 5 of the FTC Act to address John Deere withholding from its customers diagnostic software and other information necessary to repair the Deere equipment they own.<sup>13</sup>

While NFU continues to believe the FTC should pursue enforcement action as we previously requested and as noted above, and while we will continue to fight to pass legislation to ensure family farmers and ranchers have the right to repair their own equipment, NFU also supports FTC pursuing a rulemaking under the Commission’s Section 5 authority.

NFU believes it is essential that FTC promulgates a rule that, at a minimum, addresses the following consumer expectations of product repair:

- Consumable components ought to be replaceable and readily available throughout a product’s lifespan;
- Components that commonly break ought to be replaceable and readily available as repair parts;
- Consumers ought to be able to choose to take damaged products to a repair shop of their choice, or perform a repair themselves;
- When a manufacturer discontinues support for a product, its key functions ought to remain intact, and an independent repair shop ought to be able to continue to perform repairs;

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<sup>11</sup> National Farmers Union (press release), “EPA Affirms Farmers’ Right to Repair,” August 8, 2023, <https://nfu.org/2023/08/08/epa-affirms-farmers-right-to-repair/>.

<sup>12</sup> “FTC to Ramp Up Law Enforcement Against Illegal Repair Restrictions,” July 21, 2021, <https://www.ftc.gov/news-events/news/press-releases/2021/07/ftc-ramp-law-enforcement-against-illegal-repair-restrictions>.

<sup>13</sup> “Complaint requesting investigation and action to enjoin unfair methods of competition and trade practices by Deere & Company,” March 3, 2022, *Fairmark Partners, LLP*, [https://drive.google.com/file/d/1h6HVLfQ491dyAhcdYM-w5v\\_FpVKmtOB3/view](https://drive.google.com/file/d/1h6HVLfQ491dyAhcdYM-w5v_FpVKmtOB3/view).

- Identical components from two identical devices ought to be interchangeable without manufacturer intervention;
- Independent repair shops ought not be required to report customers' personally identifiable information to the manufacturer.

## Conclusion

Thank you for the opportunity to submit comments. If you have any questions or would like to further discuss NFU's position, please contact Aaron Shier, NFU Government Relations Director, via e-mail at [REDACTED] or by phone at [REDACTED]

Sincerely,



Rob Larew  
President

### *Enclosed:*

- *Letter dated June 13, 2023, from NFU to U.S. EPA*
- *Letter dated August 4, 2023, from U.S. EPA to NFU*
- *NFU-collected petition signatures and comments in support of FTC promulgating rules on Right to Repair, dated February 2, 2024*



June 13, 2023

The Honorable Michael S. Regan  
Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue NW  
Washington, DC 20460

**RE: Request for clarification from the EPA that agricultural equipment manufacturer-imposed restrictions on independent repair are not required by the Clean Air Act**

Dear Administrator Regan,

On behalf of National Farmers Union (NFU), I write to request the U.S. Environmental Protection Agency (EPA) respond to and clarify public statements by certain groups that are misleadingly invoking the Clean Air Act (CAA) as justification for limiting consumers' Right to Repair farm equipment. The independent repair of emissions control systems is *not* illegal under the CAA, contrary to the claims of some equipment manufacturers and dealers. Instead, the CAA *requires* independent repair access.

NFU is a grassroots farm organization representing family farmers, ranchers, and their communities nationwide. Since 1902, NFU has worked to ensure that farm families and their communities are respected, valued, and enjoy economic prosperity and social justice.

NFU policy supports farmers' Right to Repair their farm equipment, including self-repair, independent repair, or through repair services offered by the equipment manufacturer or equipment dealer. Because farm equipment manufacturers prevent farmers or independent mechanics from completing certain repairs without direct provision by the manufacturer or certified dealer, NFU has pursued various legislative, administrative, and other remedies to ensure farmers have adequate, fair, and legal access to the repair options of their choosing.

NFU and other repair advocates have supported Right to Repair legislation, which would restore repair parity by guaranteeing that farmers and independent mechanics have comprehensive access

to the repair materials provided by manufacturers to their dealers. Such legislation routinely includes limitations on illegal equipment modification.”<sup>1</sup>

For example, we strongly supported the recently passed “Consumer Right to Repair Agricultural Equipment” Act, Colorado HB23-1011, which states that “An independent repair provider or owner is not authorized to make modifications to agricultural equipment that permanently deactivate any safety notification system or bring the equipment out of compliance with safety or emissions laws or to engage in any conduct that would evade emissions, copyright, trademark, or patent laws.” NFU supports these limitations.

In their opposition to Right to Repair legislation, equipment manufacturers and dealers have invoked EPA regulations and the CAA – specifically related to tampering with emissions control systems – as justification for their need to restrict repair. We believe these manufacturer and dealer associations are inaccurately interpreting and/or misrepresenting what the CAA requires.

For example, a representative for the North American Equipment Dealers Association (NAEDA), in testimony before the Colorado Senate Agricultural & Natural Resources Committee, stated that they cannot allow independent repair of the emissions systems in farmers’ equipment “because we’re prohibited from doing so by federal statute.” By giving farmers access to this kind of repair, he reasoned, Colorado HB23-1011 “would be directly in conflict with the Clean Air Act.” During a hearing in the Nebraska legislature, a representative for John Deere similarly stated that they are liable to the EPA under the CAA regarding emissions controls, and thus must restrict repair.<sup>2</sup>

It is simply false to state that the CAA is incompatible with independent repair of agricultural equipment. While the CAA under 40 CFR 1068.101(b)(1) limits tampering<sup>3</sup>, the CAA states that this prohibition does not apply when “You need to repair the engine/equipment and you restore it to proper functioning when the repair is complete” and in other cases if proper functioning of emissions controls is restored. Moreover, 40 CFR 1068.101(b)(2) states that it is illegal to “knowingly manufacture, sell, offer to sell, or install, any component that bypasses, impairs, defeats, or disables the control of emissions of any regulated pollutant.”<sup>4</sup> Thus, if the manufacturer’s own repair materials and tools, which Right to Repair reforms and legislation would provide to farmers and

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<sup>1</sup> See for example Colorado General Assembly HB23-1011 “Consumer Right to Repair Agricultural Equipment”: <https://leg.colorado.gov/bills/hb23-1011> and [https://leg.colorado.gov/sites/default/files/2023a\\_1011\\_signed.pdf](https://leg.colorado.gov/sites/default/files/2023a_1011_signed.pdf).

<sup>2</sup> Transcript Prepared by Clerk of the Legislature Transcribers Office, Judiciary Committee, February 25, 2021, LB543, <https://drive.google.com/file/d/1JMOx92QM1P3r9aMFIDSFmZOY7oUuQx0H/view>.

<sup>3</sup> “You may not remove or render inoperative any device or element of design installed on or in engines/equipment in compliance with the regulations prior to its sale and delivery to the ultimate purchaser. You also may not knowingly remove or render inoperative any such device or element of design after such sale and delivery to the ultimate purchaser.”

<sup>4</sup> [https://www.ecfr.gov/current/title-40/chapter-I/subchapter-U/part-1068/subpart-B/section-1068.101#p-1068.101\(b\)\(2\)](https://www.ecfr.gov/current/title-40/chapter-I/subchapter-U/part-1068/subpart-B/section-1068.101#p-1068.101(b)(2)).

independent mechanics, allow for the bypassing of emissions controls, then the manufacturers themselves would be violating the CAA.

Additionally, 40 CFR 1039.125(f) requires tractor manufacturers to “State clearly in [its] written maintenance instructions that a repair shop or person of the owner’s choosing may maintain, replace, or repair emission-control devices and systems.”<sup>5</sup> The CAA suggests independent repair access is required, contrary to the statements from equipment manufacturer and dealer representatives.

We are asking the EPA to clarify that manufacturer-imposed restrictions on independent repair are not required by the CAA, and Right to Repair legislation that clearly continues to prohibit illegal tampering of emissions control systems, is compatible with the requirements in CAA statute and regulations.

Thank you for your consideration and we look forward to your response. If you have any questions or would like to discuss NFU’s position and request, please contact Aaron Shier, Government Relations Director, at [REDACTED] or at [REDACTED]

Sincerely,

A handwritten signature in black ink, appearing to read "Rob Larew". The signature is fluid and cursive, with the first name "Rob" being more prominent than the last name "Larew".

Rob Larew  
President

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<sup>5</sup> [https://www.ecfr.gov/current/title-40/chapter-I/subchapter-U/part-1039/subpart-B/section-1039.125#p-1039.125\(f\)](https://www.ecfr.gov/current/title-40/chapter-I/subchapter-U/part-1039/subpart-B/section-1039.125#p-1039.125(f)).





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

AUG - 4 2023

THE ADMINISTRATOR

Mr. Rob Larew  
President  
National Farmers Union  
[REDACTED]  
Washington, D.C. [REDACTED]

Dear Mr. Larew:

I would like to thank you for your letter written on behalf of the members of the National Farmers Union requesting clarification of the obligations of manufacturers to not impede independent repair of agricultural equipment. The Clean Air Act and the U.S. Environmental Protection Agency's implementing regulations clearly support repair by parties other than manufacturers.

I am happy to offer clarification because, as your letter well notes, the EPA and the Clean Air Act allow owners to repair emission-related components of their products to proper functioning. Section 203(a) of the Clean Air Act provides that:

No action with respect to any device or element of design ... shall be treated as a prohibited act ... if (i) the action is for the purpose of repair or replacement of the device or element, or is a necessary and temporary procedure to repair or replace any other item and the device or element is replaced upon completion of the procedure, and (ii) such action thereafter results in the proper functioning of the device or element....

Crucially, the Clean Air Act makes no distinction between repair by a manufacturer versus another party. Actions that qualify as repair or replacement are allowed under the Clean Air Act regardless of who makes them. Moreover, nothing in the Clean Air Act or the EPA's regulations limits a manufacturer's ability to provide service tools and information to consumers and independent repair facilities for the purpose of repairing their equipment.

The Clean Air Act denotes Congress' concern about the ways in which manufacturers might impede the ability of other parties to repair regulated equipment and puts in place safeguards to prevent that from happening. For instance, the act prohibits manufacturers from writing their service instructions (which, by separate provision, manufacturers must provide) in a way that steers end users away from independent repairers. Specifically, Section 207(c)(3) prohibits service instructions from including:

any condition on the ultimate purchaser's using, in connection with such vehicle or engine, any component or service...which is identified by brand, trade, or corporate name; or directly or indirectly distinguishing between service performed by the franchised dealers of such manufacturer or any other service establishments with which such manufacturer has a commercial relationship, and service performed by independent

automotive repair facilities with which such manufacturer has no commercial relationship.

The same Clean Air Act provision seeks to ensure that the owners of equipment know of their options for independent repair by requiring that the:

manufacturer shall provide in boldface type on the first page of the written maintenance instructions notice that maintenance, replacement, or repair of the emission control devices and systems may be performed by any automotive repair establishment or individual.

The EPA's implementing regulations reiterate these safeguards and directly apply them to nonroad engines. They also make explicit that a manufacturer cannot condition its warranty on service by a franchise dealer or someone with which the manufacturer has a commercial relationship. See 40 C.F.R. section 1039.125(f).

Your letter also discusses the important anti-tampering provisions of the Clean Air Act, and your concern that certain manufacturers may be mischaracterizing the implications of those provisions for independent repair. The act prohibits anyone from removing or rendering inoperative any device or element of design of the emissions control system in regulated equipment. See Section 203(a)(3)(A).

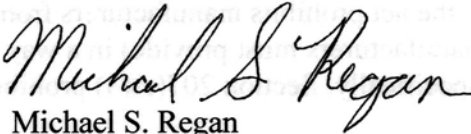
For example, removing a catalyst from an exhaust pipe or providing software or information that would facilitate tampering with an emissions control system are violations of the Clean Air Act. The act provides authority to enforce against tampering regardless of whether it is done by the manufacturer, the end user or another party. The act, implementing regulations and the EPA's policy and practice are aligned in preventing tampering not by limiting access to independent repair, but rather by enforcing the prohibition against tampering against any party that does so.

I appreciate your letter and its providing us an opportunity to again address this important issue. Like the National Farmers Union and its members, the EPA believes barriers to the proper repair and maintenance of nonroad equipment is harmful to the environment. We support efforts by anyone to enact legislation clarifying that independent repair is allowable, provided such efforts continue to clearly prohibit illegal tampering of emissions control systems.

If you have questions about this response, my colleague Rod Snyder, senior advisor for Agriculture, would be very pleased to assist you and is available at [REDACTED] or [REDACTED].

In the meantime, I offer you and your members warmest regards.

Sincerely yours,

  
Michael S. Regan

REPORT GENERATED: February 2, 2024

This report was generated on February 2, 2024, by National Farmers Union through the Action Network platform. It contains a list of signatures and comments from signees in support of a petition to the FTC sponsored by National Farmers Union in support of FTC promulgating rules on Right to Repair.

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U.S. Federal Trade Commission,

Nearly 100 people have signed a petition on Action Network telling you to: Protect Farmers' Right to Repair.

Here is the petition they signed:

NFU believes farmers and ranchers deserve the right to access, on fair and reasonable terms, the tools and information required to make timely farm equipment repairs.

Modern farm equipment requires special software tools to make certain repairs. Major equipment manufacturers refuse to make these tools available to farmers and independent mechanics, leaving farmers no choice but to take broken equipment to the manufacturer's dealer. These restrictions lead to inflated repair costs and service delays during tight planting and harvest windows that can cost farmers their crop.

The FTC should write and implement rules that ensure farmers, ranchers, and independent mechanics have access to the tools and information needed to repair farm equipment.

Farmers, ranchers, and our communities need the Right to Repair!

You can view each petition signer and the comments they left you below.

Thank you,

National Farmers Union

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**Amy Svoboda** [REDACTED]

**Judith Rzucidlo** [REDACTED]

**Art Tanderup** [REDACTED]

**Melissa Bakker Roach** [REDACTED]

**Barbara Barry** [REDACTED]

It's nonsense that we don't already have this right

**Bella DeFrancesco** [REDACTED]

**Gail Temple** [REDACTED]

As a farmer we have time sensitive work to do. If all repairman have access to the tools that they need help their customers we all will benefit.

**Bradley Jordahl Redlin** [REDACTED]

**cletus blubaugh** [REDACTED]

**Daniel Bonnet** [REDACTED]

Many of us farmers are capable of doing many repairs on our equipment. We need to keep our expenses down and this is one of many ways to do that.

**Brad Guest** [REDACTED]

**Brian Kingsbury** [REDACTED]

We do not have any factory repair services available in our area. Any facilities are a min. \$750 each way for a 100 hp tractor. I can not afford a spare when the work needs to get done. Everything I own I have to fix.

**Brian Crowther** [REDACTED]

**Bob Thompson** [REDACTED]

**Karen Womack** [REDACTED]

Farmers should have the right to repair their own equipment. Be FOR farmers, NOT AGAINST farmers.

**Carol Beaver** [REDACTED]

The absolute absurdity of farmers not being able to repair their own equipment is beyond belief. Farming is NOT on an 8-to-5 schedule, and the repair costs and delays are not sustainable in ANY way, for ANY farmer. Please support the Right to Repair as a pillar of Fairness for Farmers.

Sincerely,

Carol Beaver

Farmer's daughter from South Dakota

**Carole Fernholz** [REDACTED]

**cindy lauer** [REDACTED]

If we can not repair it is DEATH to farmers!!!!

**Cp D** [REDACTED]

**Jodi Rolls** [REDACTED]

Farmers ... (and all people) should have the right to repair their own equipment.  
To me, this is an American Value !!!

**Tom Coudron** [REDACTED]

Insuring farmers have the ability to repair their own equipment is an appropriate task of our Federal government. This can be done without additional costs to the taxpayer and it will result in savings for the farmer. Let's empower our farmers rather than impair them.

**Rhianna Miller** [REDACTED]

All farmers should have the right to repair their own equipment.

**Charles Sander** [REDACTED]

**Annette Frerichs** [REDACTED]

I support right to repair

**Dale Hadler** [REDACTED]

**Devan Fort** [REDACTED]

**Dana King** [REDACTED]

The right to repair farm equipment is critical to the longevity of farms and farmers and therefore our country's economic stability and success.

**Dennis Kellogg** [REDACTED]

To be prohibited from repairing anything one owns and most often make it better discourages the American mentality that built this nation!

**Doug Sombke** [REDACTED]

As the Farmer, I should not have to bow down to large implement manufacturers to repair my own equipment

**Gary Wertish** [REDACTED]

Farmers should have the right to repair their equipment that they have paid for and not be held captive to the original equipment manufacturers.

**George Davis** [REDACTED]

Farmers need to be able to repair their own equipment especially during critical times like harvest when local dealers are overwhelmed with repair requests.

**Hannah Bernhardt** [REDACTED]

**Stephen Murray** [REDACTED]

As a farmer, right to repair is so important. Being able to repair my own equipment or choose my own mechanic to work on them is important to keep rising costs stable. Let's not let the monopolies continue to grow.

**Hope Shand** [REDACTED]

Please protect our right to repair the products we buy and own!

Thank you!

**Angel Miller** ([REDACTED])

We need to be able to make repairs. To refuse this right, is to discriminate against poor people. Americans are industrious people for many generations. This is how we built this country. We **MUST** not allow big business to take this away from us just to line their own pockets.

**Leo Kucewicz** [REDACTED]

**Jennifer Cronin** [REDACTED]

**Jon Meis** [REDACTED]

**jonathan M Frisch** [REDACTED]

**Judi Polson** [REDACTED]

**Jake Stunkard** [REDACTED]

**Kate Stephens** [REDACTED]

**Kyle Crowther** [REDACTED]

**Kirk Skari** [REDACTED]

**K Norton** [REDACTED]

Ensure Right to Repair!

**Kevin Lang** ([REDACTED])

**Lynn Bottge** [REDACTED]

**Morgan Levine** [REDACTED]

Farmers work hard enough - they need support repairing their equipment not to be exploited.

**Lorig Hawkins** [REDACTED]

**Luke Thomas** [REDACTED]

**Lydia Ramos** [REDACTED]

Protect Right to Repair!

**Margaret Olness** [REDACTED]

We need our farmers.  
Help them survive!

**Matthew Alschuler** [REDACTED]

**Ronald Brown** [REDACTED]

**Dan McGuire** [REDACTED]

**Melanie Grace** [REDACTED]

**An anonymous signer** [REDACTED]

**Mardy Townsend** [REDACTED]

**Morgan MathisonSlee** [REDACTED]

Please protect farmers rights to repair their own farm equipment. It is vital for the longevity and sustainability of our farms!

**Mark Schaukowitch** [REDACTED]

**Ellen Murphy** [REDACTED]

**Michael Miller** [REDACTED]

We need to be able to make repairs. To refuse this right, is to discriminate against poor people. Americans are industrious people for many generations. This is how we built this country. We MUST not allow big business to take this away from us just to line their own pockets.

**Dr. Kakha NADIRADZE** [REDACTED]

The Association for Farmer's Rights Defense, AFRD (Georgia) strongly supports Farmer's Rights and will provide Advocacy Services

**Nick Levendofsky** [REDACTED]

**Nicolas Garcia** [REDACTED]

If i buy it, i should have the right to keep it in working order

**Norm Littlejohn** [REDACTED]

**Nicole Davidow** [REDACTED]

**Glenn Churchill** [REDACTED]

Self-sufficiency is a prerequisite to survival.

**Steve O'Neal** [REDACTED]

**Oren Lesmeister** [REDACTED]

**Daniel Kelley** [REDACTED]

**An anonymous signer** [REDACTED]

**Patrick Finney** [REDACTED]

It is imperative that the FTC ensures safeguards against software locks and other technologies designed to consolidate control with Big Ag and further erode American food security and food sovereignty. Farmers are being forced to "purchase" very expensive equipment that the dealer effectively still owns. If you can't repair it, you don't own it. This is the one of the last bulwarks against a complete usurpation of the independent family farmer. Our over-reliance on technology and AI can and will weaken our food system. It already has. Just ask anyone who was alive in 2020. Our food security and national security are at risk. Act now.

**Richard Church** [REDACTED]

It is critical that farmers and ranchers have the right to repair their equipment, plain and simple.

**Rachel Goldberg** [REDACTED]

**Roger Wise** [REDACTED]

Stand up to corporate on behalf of family farmers

**Leslie (Eddie) Todd** [REDACTED]

We at Arkansas Farmers Union greatly support the right to repair. The American Family Farmer has enough stress as it is. Without the right to repair it adds even more stress with extremely higher repair cost from the dealers, longer downtimes in the fields which can be extremely costly. We need the right to repair.

**Ron Todd-Meyer** [REDACTED]

**Becky Potmesil** [REDACTED]

**Reana Kim** [REDACTED]

**Montana Farmers Union Montana Farmers Union** [REDACTED]

**Stanley Johnson** [REDACTED]



**Sarah Degn** [REDACTED]

Please keep up the progress the FTC has made so far on this very important issue! Those of us who live in the middle of nowhere have few options to get our equipment repaired, and often make repairs ourselves. We aren't trying to get around settings, we just want to reset sensors and find the problem, without having to wait weeks for a mechanic, all while our crops need to be harvested and go to waste in the field.

**Soo Sun Choe** [REDACTED]

**Stephen Hanna** [REDACTED]

Also for construction equipment!

**Stephen Parker** [REDACTED]

Stand up for farmers that grow our food!

**Steve Braun** [REDACTED]

**Charlene Denys** [REDACTED]

I can get my car or truck repaired by any competent mechanic, or do it myself. Farmers deserve the same for their equipment, rather than being compelled to have repairs done by vendors, who thereby avoid competition.

**Marcella Thompson** [REDACTED]

All individuals should have the right to repair the things they purchase because they are the owners. This includes farm equipment

**Tyler Garrett** [REDACTED]

**Valerie Littleton** [REDACTED]

Please protect and defend farmers, ranchers, and mechanics. Right to Repair is critically need. It is an essential and basic, and is an economic no-brainer.

The FTC should write and implement rules that ensure farmers, ranchers, and independent mechanics have access to the tools and information needed to repair farm equipment.

Valerie Littleton

**Windsor Pippin** [REDACTED]

Right to repair is fundamental to protecting the right to own. If we can't fix it do we even own it?

**Wade Johnson** [REDACTED]

**Frank Kane** [REDACTED]

Serve the farm

**Ariel Zakarison** [REDACTED]