

## Anonymous

I strongly disagree with the proposed expansion of the ADS-B mandate, with inclusion for VFR and recreational/sports unpowered aircraft.

Recreational unpowered personal aircraft including Paragliders/hang gliders should be exempt from this mandate for the following reasons:

1) Unpowered aircraft need to reduce not increase weight and system complexity. The mandate would require recreational pilots to carry additional equipment and a power source (or run the risk of batteries failing/depleting in flight). With limited options of stowing the power source and mounting the ADS-B device itself, it would be impractical on most paraglider setups.

The added weight of these items can also change the geometry of a harness (which then changes the weight-shift capabilities of the aircraft). This can affect the aircraft's responsiveness during turns and recovery to level flight. The added weight would also increase the risk of injury during landing as pilots would have more weight to carry on their legs during the landing phase. The added weight also comes at an opportunity cost to other items that are actively necessary including first aid kits, water, clothing, and stronger harnesses and materials.

2) Aircraft capabilities - When compared to Drone capabilities or in future flying cars, paragliders and Hang Gliders are slow moving and slow to respond to pilot controls.

Paragliders also have predictable flight paths in given conditions. The flight of a hang glider or paraglider will largely be limited by atmospheric conditions for launch, landing, direction, speed and altitude. For which existing measures of communication are more than sufficient for participating in the air with other aircraft.

When mixed aircraft are flying, the Drone pilot should bare responsibility when it comes to aircraft avoidance in flight. Similar to the maritime rule of power gives way to sail, drones must be aware of and give way to manned aircraft.

Other powered and heavier aircraft should also bare responsibility for flight paths and avoidance as they have more discretion to manoeuvre and set destination and flight goals.

3) Recreational Aviation - Freeflight pilots fly for the sheer passion of aviation and flight. Not only are the ADS-B units not practical for freeflight, they are also another unnecessary regulation which could result in the decline of the sport of Freeflight and recreational aviation in general.

The cost to acquire and maintain the ADS-B device and power supplies is another unnecessary cost that will make the fee flight past time of paragliding and hang gliding even more prohibitive to the public with less financial means.

Most pilots already fly with a combination of GPS Locator and broadcasting device, and also a phone. Another device that is superfluous and redundant while adding additional weight and complication is a greater risk than benefit. More systems to manage means there are more chances that a system will fail. Adding an ADS-B will increase the risk that an error may occur in managing or maintaining a more critical system over time. This is an unnecessary and risky complication to add to an activity that has other better safety and communication measures to employ.