

## Darryn Rogers

### **Exemptions from ADS-B Mandate for Sports Aviation**

The proposed regulation requiring ADS-B systems on all aircraft, including those used in sports aviation such as paragliding and hang gliding, warrants careful consideration. I firmly believe that mandating these devices would be detrimental to our community, resulting in significant financial burdens without substantial safety improvements.

1. **Cost:** The cost of ADS-B units is substantial. The attraction of paragliding/hang-gliding for most pilots is the low cost compared to other forms of aviation. Integrating an additional device may lead to fewer people being able to participate in the sport.
2. **Low collision risk:** A combination of factors such as low speeds, visibility, audible detection, limited air traffic in common free-flight areas, and existing radio procedures minimizes the likelihood of mid-air collisions between paragliders/hang gliders and conventional aircraft.
3. **Minimal impact on ATS (Air Traffic Services):** Paragliders and hang gliders do not operate within controlled airspace, so ADS-B systems would not significantly affect air traffic management.
4. **Existing search and rescue practices:** The sports aviation community has well-established protocols for search and rescue operations using mobile and satellite services like inReach and Spot. These tools provide effective location tracking even when pilots are on the ground or stranded in difficult terrain. ADS-B is unlikely to replace these existing methods without significant enhancements.
5. **Limited benefits for accident investigation:** The use of ADS-B systems in paragliding and hang gliding incidents would not provide substantial improvements to accident investigations, as most accidents occur during takeoff and landing phases when the device's data is less relevant.

A more gradual adoption approach that considers industry support would help mitigate the impact of introducing new technologies. I welcome improved aviation safety benefits for conventional aircraft but firmly believe that exceptions and ongoing consultation with our community are necessary to ensure we don't compromise our sport's freedom without tangible gains from ADS-B-driven safety.

Thankyou

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