

Submission: 236

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I strongly disagree with the proposed expansion of the ADS-B mandate, with inclusion for VFR aircraft.

Paragliders/hang gliders should be exempt from this mandate for the following reasons:

- 1) Unpowered aircraft - This would require us to carry 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.
- 2) Aircraft capabilities - When compared to Drone capabilities, paragliders and Hang Gliders are slow moving and slow to respond to pilot controls. 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.....
- 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.

I have attached a photo of the instrument carrier that I fly with. This is one of the largest available for my open style harness, most who fly open harnesses do not carry one at all, attaching small instruments to the glider risers and leaving no room for an ADS-B unit to be mounted in a useful and safe manner. Most pilots also fly with a PLB, phone and handheld UHF radio, and on soaring or cross country flights also carry a handheld VHF.