

Submission: 238

Nokkie

Dear;

I fly paraglider often inland in VFR airspace with an ADSB-out installed (skyecho2). I think a mandate for all operations of ADSB-IN and -OUT is not practical for paraglider and further the introduction of such a mandate opens the path to effectively remove VFR airspace and rights due to the imposed requirements of an ADSB system. I suggest ADSB-out mandate in CTAF makes sense and that drones will need to develop vfr avoidance technologies.

Cheers

Response to:

Potential future expansion of Automatic Dependent Surveillance Broadcast (ADS-B) mandate in Australia—Consultation Paper

Dear;

I am flying a paraglider about 100 hrs per year inland VFR airspace. I do fly the paraglider with ADSB – OUT at times. I am using a skyecho-2.

While I am absolutely supporting voluntary carrying ADSB – OUT I think there is not much practicality in an ADSB-IN screen for paraglider. We fly slow (30-50kmh) and have very limited ability to avoid a collision with a much faster aircraft. In that sense an ADSB -IN mandate doesn't make sense. There is also limited space for another display on a paraglider setup.

Some paragliding operations at the coast near dunes also do not make sense to carry an ADSB and would make flying there much more expensive to parts of the community of paragliders who never fly inland (at heights>500m and away from launches).

My main concern with the introduction of a mandate is the loss of VFR airspace in the long term. Arguably the reliability requirements towards an ADSB device will push private operators out of the airspace and IFR can be expanded into former VFR airspace.

Another concern is that in competitions we often fly up to 100 paraglider in a single thermal, close together (about 0.1km^3). I don't know if ADSB for a third party aircraft can resolve the high density of paragliders locally or get confused by it (eg a drone reacting to ADSB).

The accommodation of drones into VFR should only occur under VFR capabilities, not by extending IFR technologies.

Let me answer your questions:

Do you support an ADS-B mandate?

No I do not support the mandate.

Why or why not?

It removes the VFR airspace long term as we know it and makes it effectively an IFR airspace with the obligation for all aircraft to carry reliable (!) ADSB instrumentation which is not practical for eg paraglider due to instrumentation burden. It also takes the burden off drones to visually react to an obstacle.

If so, what airspace and/or aircraft types would you include in it?

It makes sense to have an ADSB mandate in CTAF as we know it for all aircraft.

Can you provide feedback on the potential model (Figure 1 and Figure 2)? • Do you consider the model to be sensible and achievable? Why or why not? • What aspects of the model would you retain, alter, or discard? Why or why not? • What impact would the model have on your operations, if applicable? ☐ What are the estimated costs that you might incur in complying with this mandate? ☐ What are the potential benefits for your operation? • Were the model adopted as government policy, when should all VFR aircraft in all airspace be fitted with approved ADS-B equipment (currently 'beyond 2033')? • Are the proposed weight and height limits for drones, above which an ADS-B OUT mandate would apply, appropriate?

There is no safe drone weight or altitude when colliding with a paraglider.

Are any of the alternate options outlined at Figure 1 a better way forward? Why or why not?

I don't see any of the proposed models as practical. An ADSB-OUT only mandate for paraglider, balloons may be sensible.

Noting the Government's ADS-B rebate program, have you fitted ADS-B to your aircraft? Why or why not?

I have paid the full ADSB myself as the government discount is only available to registered aircraft.