Submission: 251

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I strongly disagree with the proposed expansion of the ADS-B mandate to include all aircraft operating under VFR. 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 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 are slow moving and slow to respond to pilot controls. When mixed aircrafts are flying, the drones (powered aircraft) should bear responsibility for avoiding collision in flight.
- 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.

See attached image of an open harness, there really is no way to mount a ADS-B and power source.

