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Paul Shipley

Submission to the ADS-B Mandate Consultation

Name: Paul Shipley MBE

Location: Canberra, ACT

Affiliation: Recreational Aviation Advocate (Paragliding and Hang Gliding)

Submission Type: Public

Executive Summary

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. One of the currently ADS-B devices has a transmission power of 20 Watts, and the recommendation is that it is a minimum of 45 cms from the pilot, which is impossible as a paragliding and hang gliding pilot we carry all the equipment either on us or in very close proximity, within 45 cms.

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 bear responsibility when it comes to aircraft avoidance 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, but they are also another unnecessary regulation which could result in the decline of the sport of Freeflight and recreational aviation in general, and have detrimental effect on the Freeflight sport, let alone the significant cost.

See attached image of POD harness cockpit and the limited space available to mount instruments. When you factor in most pilots also fly with a GPS Locator (Spot/Inreach/EPIRB) and a phone, there really is nowhere left to mount an ADS-B and power source. In an open harness (which most pilots fly) there is no way of fitting said devices. Note that I also carry two radios on my person, a UHF and a VHF radio.

Paul Shipley MBE

Paragliding Pilot

President of Australia Capital Territory Hang gliding and Paragliding Association (ACTHPA)

Member of the Sports Aviation Federation Australia (SAFA)

Image of myself flying my paraglider with a pod harness – note the limited space available, and the cockpit instrument panel (outlined in RED) – which consists of a mobile phone, flight instrument (which includes map display and vario), and a Garmin Inreach (used for tracking and emergency SOS if required).