



ASSOCIATION OF COMMERCIAL DIVING EDUCATORS

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February 25, 1998

Lieutenant Diane Kalina
U. S. Coast Guard – **Office** of Operating
and Environmental **Standards**, USCG Hqtrs.
Commandant (G-MSO-2)
2100 Second Street, SW
Washington, DC 20593

Dear Lieutenant Kalina:

It was a pleasure meeting you during the Association of Diving Contractors (ADC) Annual Conference in New Orleans. As I explained to you, the Association of Commercial Diving **Educators** (ACDE) is the association of commercial diver training institutions all currently in existence throughout the United States.

The ACDE was formed in 1974 to promote commercial diving safety through education in the United States. It has since established the **ANSI** Standards to establish the minimum parameters' for curriculum, hours of training, specific equipment requirements, safety standards and standards of good teaching for training entry-level commercial divers.

Currently, all ACDE member schools are required to teach a minimum of **625-hours** of instruction to our students as specified by the revised **ANSI** Standards. Most schools however teach curricula far in excess of **625-hours** in **order** to ensure that students are **sufficiently** trained in safety and diving operations.

Unfortunately, we learned during the ADC Conference that the ADC board is initiating its own minimum training requirements of approximately 260 to 280 hours. Furthermore, we understand that the ADC is soliciting the Coast Guard to adopt these low standards of training.

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The Canadian Oil and Gas Diving Regulations – Diver-Training Guidelines specifies a minimum of **1040-hour** as a requirement for its diver training. Various European Standards also require substantially more hours of diver **training** than the Association of Diving Contractors (ADC) is currently proposing.

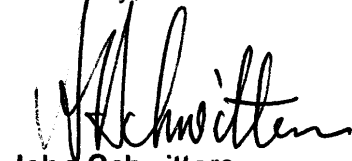
It is the unanimous position of the member training organizations that such drastically low hours are a significant deviation from current established minimum standards which were cooperatively developed by the recognized training and educational experts in commercial diving.

Furthermore, **we** feel that any level of training below this minimum standard presents an unacceptable and inherent risk to the safety of **entry-level** commercial diving personnel. The ADC has succeeded in reducing accidents worldwide in the last ten years with the publication of the current Consensus Standards for Commercial Diving Operations. Adoption of reduced training requirements as part of Federal law would in-fact be contradictory to the long-standing ADC motto of "Communication, Education and Safety."

We feel it is wrong to arbitrarily reduce minimum training requirements in order to meet a temporary manpower shortage in an industry where safety is paramount.

The ACDE membership is offering the U. S. Coast Guard any assistance needed in addressing this critical issue.

Sincerely,



John Schwitters
Vice President – ACDE

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