



ASSOCIATION OF COMMERCIAL DIVING EDUCATORS

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**VIA CERTIFIED MAIL – RETURN RECEIPT REQUESTED #P 839 208 575**

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Docket Management Facility  
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Room Pt-401  
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Washington, DC 20590-001

DEPARTMENT OF TRANSPORTATION  
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BOARD SECTION

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To Whom It May Concern:

The Association of Commercial Diving Educators (ACDE) was established in 1974 and is currently comprised of five (5)-**accredited** schools (see listing on letterhead.) All five of these schools are well established and have been in operation for 20 – 30 years. Most of these schools were working together to improve the quality and consistency of commercial diver training even before the association was formed.

In 1993, ACDE in conjunction with ANSI developed minimum training standards for the commercial diving industry in the United States. In 1995, the ADC requested that the ACDE update and strengthen that standard. We substantially revised the standard and assigned minimum training hour requirements. This newly revised document has just been accepted as the American National Standard, **ANSI/ACDE-01-1998** Commercial Diver Minimum Training Standard.

The ACDE schools are also members of the International Diving School Association. This association is striving diligently to develop an internationally recognized training standard. Much progress has been made over the last two years including recognition of the ACDE member schools by the International Marine Contractors Association (IMCA). Britain's Health and Safety Executive (HSE) is also beginning to recognize and accept Commercial Diver Training conducted outside the United Kingdom by accredited schools.

The following response to questions #2, 11 and 12 as listed in your request for comments USCG-1998-3786 is the consensus and considered response of the ACDE.

**2. Should the U. S. Coast Guard adopt the ADC Consensus Standards or any other written industry Standards? If so, which ones and why?**

We would be supportive of adopting the ADC Consensus Standards provided that all sections relating to the training of entry level personnel be omitted.

The ACDE as a whole dedicates its time to addressing the issues surrounding safety, education, and minimum qualifications needed to function safely in the marine environments.

It is the position of this association that the federal government should rely on the accredited institutions that are actively involved in the training of entry level Commercial Divers as the training authorities.

The Coast Guard is not in the diving business, nor is the ADC in the training business. The government should review and adopt those industry standards that are being used and are easily updated to reflect changes taking place. As an educational body who has been involved in the training of Commercial Divers and Marine Technicians for over 30 years, we would be supportive of having the U. S. Coast Guard adopt the ANSI Standards for Commercial Diver Training **ANSI/ACDE-01** -1998 Commercial Diver Training-Minimum Standard.

**11. Should the U. S. Coast Guard propose regulations concerning minimum training requirement for divers? If yes, how should it be addressed?**

The U. S. Coast Guard should regulate the training requirements of commercial divers by requiring the trainee to complete training which directly adheres to the ANSI Standards for Commercial Diver Training **ANSI/ACDE-01**-1998 Commercial Diver Training-Minimum Standard. This requirement specifies minimum training hours by an accredited diver training school. The U. S. Coast Guard should require that a new-hire candidate provide proof of training adhering to that ANSI standard.

The U. S. Coast Guard should regulate and monitor the training requirements for advancement of non-entry level personnel (i.e. in-house employees) by

working with the ADC and its member companies to address their in-house advancement programs and levels of training requirements. **While** this area is outside the scope and mission of the ACDE, we are concerned that "in-house" training provided by the contractors may be driven more by the current market condition than a dedicated commitment to consistent training practices and quality control.

**12. If you think the regulations should include minimum training requirements, please answer the following questions:**

**a. What courses or information should the training include?**

Those as outlined by the ANSI Standards for Commercial Diver Training **ANSI/ACDE-01-1998** Commercial Diver Training--Minimum Standard.

**b. What should be the minimum training hours required for training?**

625 training hours is the consensus within the industry as established through the formal ANSI process. This is the minimum amount of time required to train an entry-level commercial diver to be able to perform his/her duties to an acceptable standard with limited supervision.

**c. What would be the benefits of establishing minimum training requirements?**

A reduction in the number of accidents and fatalities throughout the commercial diving industry should be realized as a result of appropriate and consistent training standards.

Safety of personnel is our primary concern. Serious accidents and fatalities within the commercial diving industry can often be, at least partially, attributed to insufficient training and/or experience.

Competency based training and consistency of performance is essential to the training and evaluation process. This requires both adequate time and standardization amongst training organizations and employers whereby minimum qualifications and expectations are clearly defined. The result of this should be a reduction in the number of unqualified persons vvho are placed into positions that jeopardize safety and operational productivity.

**d. Should training organizations or providers meet certification requirements? If so, what organization should certify the training organizations or providers?**

Yes. Training organizations should be certified by organizations that are representative of both diver training and vocational education. Accreditation by a federally recognized accrediting body, recognized by the U.S. Department of Education should be required.

Because of the very specialized nature of commercial diver training, and because of the safety concerns inherent in this industry, we also recommend certification or accreditation by an industry specific body. At present, the only such organized body is the Association of Commercial Diving Educators (ACDE).

The ACDE can and would collaborate with representatives from member schools, the U S. Dept. of Education, the U. S. Coast Guard, the ADC and any state or local educational agencies in order to insure a coherent program and a consistent level of commercial diving education throughout the country.

If you have any questions or require any clarification, please do not hesitate to contact me at (310) 834-2501.

Thank you for the opportunity to comment on these issues.

Sincerely,



**John Schwitters**  
Vice President – ACDE

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