

# INSHORE



Solving underwater problems through advanced diving techniques

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DEPARTMENT OF TRANSPORTATION

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DOCKET SECTION

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September 8, 1998

Docket Management Facility (USCG-1998-3786) - 11  
U.S. Department of Transportation  
Room PL-40 1  
400 Seventh Street SW  
Washington, D.C. 20590-0001

**SUBJECT: COMMERCIAL DIVING OPERATIONS**

**REFERENCE: U.S.C.G. A.N.P.R.M.**

Gentlemen:

As the President and General Manager of INSHORE DIVERS, INC., I encourage acceptance and implementation of changes and revisions to Subchapter V-Marine Occupational Safety & Health Standards, Part 197-General Provisions, Subpart B-Commercial Diving Operations as submitted by the Association of Diving Contractors.

The Association of Diving Contractors comments and recommendations, to be submitted directly by that organization in response to questions # 1 through # 14 of ANPRM, Docket Reference: USCG-1998-3786, have been carefully reviewed by INSHORE DIVERS, INC. It is our opinion that the questions raised by the Coast Guard have been answered in a manner that promotes greater safety in the Commercial Diving industry. We further believe that the adoption and implementation of the ADC recommendations to be appropriate to current USCG initiatives.

It is also strongly recommended that the ADC Consensus Standards for Commercial Diving Operations, to be revised to reflect decisions made with regard to response to reference ANPRM, be, as a minimum, quoted in the resulting rulemaking document as a primary reference for the conduct of commercial diving. In fact, we would urge Coast Guard to adopt the ADC Consensus Standards for Commercial Diving Operations as the U.S. National regulation. In that manner changes can be made in a publicized, timely, and cost effective manner as appropriate to changes in technology. It would also **simplify** the current regulations enabling USCG units and purchasing authorities to understand the



ASSOCIATION OF DIVING CONTRACTORS  
MEMBER

diving regulations without needing an interpretation for Headquarters, as they now do (West Coast).

**Respectfully** submitted,

INSHORE DIVERS, INC.

A handwritten signature in black ink, appearing to read "W. F. Aichele". The signature is written in a cursive style with a large, stylized initial "W".

William F. Aichele  
President

**WFA/kk**

cc: Association of Diving Contractors