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Paul Lynch & Associates, Inc.
Insurance Consultants & Agents

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U.S. Department of Transportation – Room PL-401
400 Seventh Street SW
Washington, DC 20590-0001

Subject: Commercial Diving Operations – 46 CFR 197

Reference: Advanced Notice of Proposed Rulemaking – Docket USCG – 1998-3786

Gentlemen:

Our company, Paul Lynch and Associates, Inc. is actively engaged in providing insurance coverage to many of the Association of Diving Contractor (ADC) members. As a supplier to this industry we strongly encourage the Coast Guard to accept and implement the ADC changes and revisions pertaining to 46 CFR.

Our main concern as an insurance agency specializing in this area is to protect our clients; and we feel the ADC response to Docket 3786 will promote a much stronger safety program for the commercial diving industry.

Thank you for your past help in these matters.

Sincerely,



Paul Lynch
President