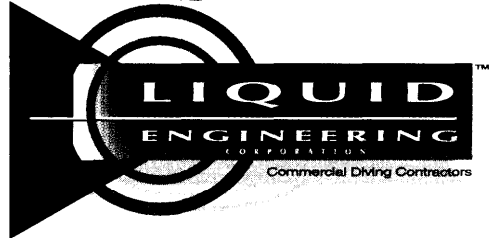


43388



DEPT. OF TRANSPORTATION
DOCKET SECTION

98 SEP 21 PM 3: 58

September 16, 1998

Docket Management Facility [USCG- 1998-3786] -26
U.S. Department of Transportation, Room PL-401
400 Seventh Street SW
Washington, DC 20590-000 1

Subject: Commercial Diving Operations; 46 CFR 197

Reference: Advanced Notice of Proposed Rulemaking; Docket USCG- 1 99 8-3 7 86

COMMENT

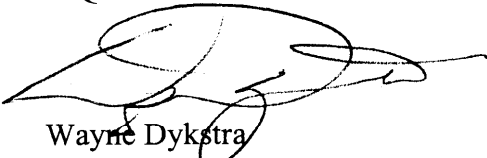
This company as an active and concerned member of the Association of Diving Contractors, wishes to encourage Coast Guard to accept and implement the changes and revisions to 46 CFR 197, as submitted by the ADC.

The Association of Diving Contractors comments and recommendations, to be submitted directly by that organization in response to *Questions 1 - 14 of ANPRM, Docket Ref: USCG-1998-3786*, have been carefully reviewed by this company. It is our opinion that the questions raised by Coast Guard have been answered in a manner to promote greater safety in the commercial diving industry. We further believe that adoption and implementation of the ADC recommendations to be appropriate to current Coast Guard initiatives involving Partnering Through People and Industry.

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, I would urge Coast Guard to adopt the ADC Consensus Standards for Commercial Diving Operations as the U.S. National regulation.

The ADC Consensus Standards document is reviewed on an annual basis to identify changes that may be appropriate. Only after approval by a consensus of the members and the Board of Directors are such changes promulgated. This process is intended make to make provision for advances in technology, change to industry operating practices, and/or other events that may evolve. Further; the ADC Consensus Standards are to be posted on the Internet and thus, change-related actions can be promulgated to all stakeholders in a cost-effective and thorough manner, all at no cost to Coast Guard

Sincerely,
LIQUID ENGINEERING CORPORATION



Wayne Dykstra
President