

43383
oceans technology inc.

3836 SPENCER ST. • HARVEY, LA 70058
PHONE (504) 340-4601 • FAX: (504) 340-4602
E-MAIL: oceansla@iamerica.net

DEPT. OF TRANSPORTATION
DOCKET SECTION
98 SEP 21 PM 3:56

September 17, 1998

Docket Management Facility [USCG-1998-3786]-27
U.S. Department of Transportation, Room PL-40
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:

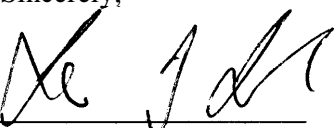
This company, as an active and concerned member of the Association of Diving Contractors wishes to encourage the Coast Guard to accept and implement the changes and revisions to 46 CFR 197 as submitted by the ADC.

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 the Coast Guard have been answered in a manner to promote greater safety in the commercial diving industry. We 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, 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 the 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. After approval by a consensus of the members and the Board of Directors are such changes promulgated. This process is intended to make provision for advances in technology, change in industry operating practice, and/or other events that may transpire. 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 and at no cost to the Coast Guard.

Sincerely,



Linden J. Leask, President