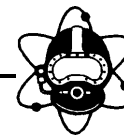


# Marine Technologies Inc.

Worldwide Underwater Services • Construction • Engineering • Maintenance • Repair



43545

September 17, 1998

DEPT. OF TRANSPORTATION  
DOCKET SECTION  
98 SEP 22 AM 11:59

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

Re: Commercial Diving Operations; 46 CFR 197  
Advanced Notice of Proposed Rulemaking  
Docket USCG- 1998-3786 -30

Dear Sir or Madam:

Marine Technologies, Inc. has employed over 25 commercial trained divers this year, and as an active and concerned member of the Association of Diving Contractors ("ADC"), we want to encourage the Coast Guard to accept and implement the changes and revisions to 46 CFR 197 as submitted by the ADC.

The ADC comments and recommendations, to be submitted directly by that organization in response to Questions 1 – 14 of ANPRM, Docket Re: USCG-1998-3786, have been carefully reviewed by this company. In our opinion, the questions raised by the Coast Guard have been answered in a manner to promote greater safety in the commercial diving industry. We also believe that the adoption and implementation of the ADC recommendations would 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 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 to 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 not cost to the Coast Guard.

Sincerely,

Terry Clarke  
Vice President

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