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Docket Management Facility [USCG-1998-37861 - 31]  
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

Dear Sirs:

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 carefully answered in a manner to promote safety in the commercial diving industry. We further believe that the adoption and implementation of the 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 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 consensus of the members and the Board of Directors such changes are promulgated. This process is intended to make provisions for advances in technology, changes to industry operating practice, and other events that may transpire. Further, the ADC Consensus Standards are to be posted on the Internet. Thus, change-related actions can be promulgated to all concerned in a cost-effective and thorough manner and at no cost to the Coast Guard.



Andrew Lacovara

Director of Underwater Services



Rogan Stearns

President