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Docket management Facility (USCG- 1998-3786-h
U.S. Department of Transportation Room PL-40 1
400 Seventh Street SW
Washington, DC 20590-000 1

Subject: Commercial Diving Operations: 46 CFR 197

Date:9-23-98

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

DEPT. OF TRANSPORTATION
DOCKET SECTION
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Diving Systems International (DSI) is an active and concerned member of the Association of Diving Contractors. DSI is a world leader in the development and manufacturing, of man worn commercial / military diving equipment. DSI supports and encourages the revisions to 46 CFR 197 as submitted by the Association of Diving Contractors (ADC).

The need for revision of 46 CFR 197 is long over due and we feel that this is a good opportunity to not only correct and update rules but also adopt the ADC consensus standards. The response by the ADC to questions 1- 14 of ANPRM, docket Ref: USCG-1998-3786, have been carefully reviewed by DSI and we believe these questions have been answered by the ADC. We also believe adoption of the consensus standards will help the Coast Guard and the commercial diving industry influence a thought change, and draw a distinction in the types of diving and diving related activities. This is a great benefit to the Coast Guard. The Coast Guard will be aided by the ADC through the on going consensus review and through the large network of experience and talent of the ADC members.

Sincerely,

Michael F Ward

Director of Military and Technical Affairs