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DOCKET SECTION

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National Underwater  
Accident Data Center  
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TO:

Docket Management Facility  
(USCG-1998-3786) -41  
U.S. Department of Transportation  
Room PL-401, 400 Seventh Street SW  
Washington DC 20590-0001

By way of introduction, my name is John J. McAniff, Director of the National Underwater Accident Data Center (NUADC) at The University of Rhode Island. This office has been funded by various and sundry grants from 1970 through 1995. Sources of funding have included: the U.S. Dept. of Health, the U.S. Coast Guard (USCG), the NOAA Undersea Research Program, the Diving Equipment Marketing Association (DEMA) and the Professional Association of Diving Instructors (PADI). From 1990 through 1995 we operated as a subcontractor to the NOAA funded Divers Alert Network (DAN) at Duke University. All funding for this effort ceased in August of 1995.

The product of this effort has been a report published more or less annually titled: UNITED STATES UNDERWATER DIVING FATALITY STATISTICS. This work had been primarily aimed at data concerning the recreational diving industry until the advent of efforts to establish regulation of the commercial diving industry by both OSHA and USCG. At that time (in 1973) we met with USCG, OSHA and NOAA to extend our study to cover "Occupational Diving Fatalities? The mandate of this meeting established 13 different categories of occupational fatalities, based specifically on the type of work performed. These categories are as follows:

#### Commercial

C-I; includes offshore construction and salvage diving, plus oil and gas related operations.

C-II: includes harbor and inland diving, such as construction, shallow pipe inspection, salvage and repair.

C-III; includes ship-related diving, such as construction, repair and hull cleaning.

C-IV: includes all types of commercial fisheries: abalone, sea urchin, seaweed harvesting, black coral diving,

C-V: includes scientific diving for paid consulting purposes.

C-VI; includes diving while in training for professional diving.

C-VII; includes other types of commercial diving not specifically set forth in the above categories, such as underwater photography, private research, commercial treasure diving, archeological diving, etc..

plus the following which are not specifically commercial but are occupational in nature.

Academic (F); includes scientific research by persons associated with an academic institution.

Government, military (G); includes on-duty divers in the U.S. Navy, U.S. Army, USCG etc..

Government, civil (H); includes local state and federal employees, such as police and fire department search and rescue units etc..

Instructor, commercial (I); includes those actively engaged in teaching commercial and professional diving.

Instructor, recreational (J); includes certified instructors in sport and recreational diving.

Scientific (K); includes individuals who meet the OSHA definition of scientific diving or are clearly a part of the scientific community.

In the process of this research we have investigated and analyzed many of the fatal cases which fall within the USCG Commercial Diving regulations.

Based upon the expertise acquired through this research I would make the following comments regarding the docket item.

There is a definite need for the USCG to provide more knowledgeable personnel for the purpose of investigating commercial diving regulations violations.

I will strongly urge **aand** request that the USCG conduct public hearings on this matter since there are other entities whose voice should be heard besides the Association of Diving Contractors (ADC).

I strongly support the proposals from the Commercial Dive Safety Organization (CDSO) and have actively contributed to their comments.

There is an urgent need to establish an agency for the purpose of classifying, testing and certifying individuals at the various levels within the diving industry (eg; tender, diver and class, supervisor, superintendent. etc.). This effort needs to come from the diving industry itself.

I have made some input to the **CDSO** proposal and comment but would emphasize the following:

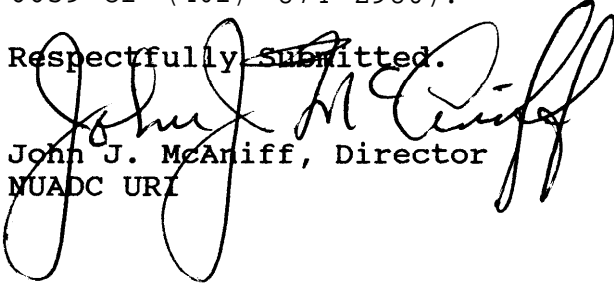
197.454 There should be a detailed listing of the minimum contents of a first aid kit to be on hand at every commercial diving site.

do All diving sites should be required to have on hand an Emergency Oxygen Treatment System and at least one person in the team should be a **certified** Oxygen Provider.

In closing I must comment that there is at present no effort to collect information on all Occupational diving accidents and fatalities other than the in-house compilation by ADC. I would be happy to prepare a proposal for such work if requested to do so.

If the USCG can further use my services and expertise I can be contacted at the above address or by phone at (401) 847 6659 or (401) 874 2980).

Respectfully submitted.



John J. McAniff, Director  
NUADC URI