

Infrastructure Engineers, Inc.

Structural Engineers Commercial Divers

DEPT. OF TRANSPORTATION
DOCKET SECTION
98 SEP 24 PM 4:58

43765

September 18, 1998

Docket Management Facility [USG-1998-37861 -46]
U.S. Department of Transportation, Room PL-401
400 Seventh Street SW
Washington, DC 20590-000 1

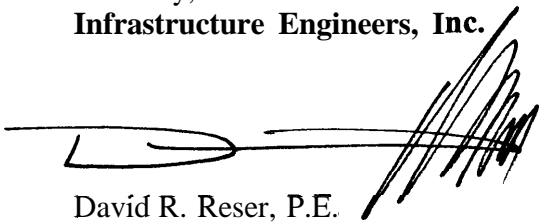
Subject: Commercial Diving Operations; 46 CFR 197
Reference: Advanced Notice of Proposed Rulemaking; Docket USCG-1998-3786

We are encouraged by the Coast Guard's decision to review 46 CFR197 in an effort to improve safety. As a member of the Association of Diving Contractors (ADC) we would like to encourage the Coast Guard to accept and implement the changes and revisions to 46 CFR 197 as submitted by the Association.

We strongly recommend that the ADC Consensus Standards for Commercial Diving Operations be adopted as the U.S. National regulation.

The ADC Consensus Standards document is reviewed on an annual basis to identify changes that may be appropriate. This process is intended to make provisions for advances in technology; change to industry operating practice, and/or other events that may transpire. The ADC Consensus Standards are to be posted on the Internet and thus; change related actions could be extended to all stakeholders in a cost-effective and thorough manner and, at no cost to the Coast Guard.

Sincerely,
Infrastructure Engineers, Inc.


David R. Reser, P.E.
President