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DEPT. OF TRANSPORTATION
DOCKET SECTION
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AQUATIC SOLUTIONS
UNDERWATER REPAIR TECHNOLOGIES

Docket Management Facility [USCG-1998-37861 -55]
U.S. Department of Transportation, Room PL-401
400 Seventh St.SW
Washington, DC 20590-000 1

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

COMMENT

Aquatic Solutions; as an active member of the Association of Diving Contractors hopes 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 Question 1 – 14 of ANPRM, Docket Ref: USCG-199% 3786, have been reviewed by us at Aquatic Solutions. It is our opinion that the questions raised by the Coast Guard have been answered in a manner to promote greater safety in the commercial diving industry. We also feel that the adoption and implementation of the ADC recommendations **to** be appropriate to current Coast Guard initiatives involving Partners 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 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 maybe appropriate. After approval by a consensus of the members and the Board of Directors are such changes promulgated. This process is intended to make provisions for advances in technology; change to industry 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 an a cost-effective and thorough manner, at no cost to Coast Guard.

Sincerely

Drew Anderson, Owner
Aquatic Solutions