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September 22, 1998

Docket Management Facility (USCG-1998-3786)-57  
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

### COMMENT

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 answered in a **manner** to promote greater safety in the commercial diving industry. We further believe that adoption and implementation 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 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 would urge the Coast Guard to adopt the ADC Consensus Standards for Commercial Diving Operations as the I.J.S. National regulation.

The ADC Consensus Standards document is reviewed on an annual basis to identify changes that may be appropriate. After approval by a consensus of the members and the Board of Directors are such changes promulgated. This process is intended to make provision for advances in technology; change to industry operating 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 in a cost-effective and thorough manner and, at no cost to the Coast Guard.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce Trader", written in a cursive style.

Bruce Trader  
President

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