

OCEAN ADVANCED RESEARCH, LTD.

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DEPT. OF TRANSPORTATION
DOCKET SECTION

44022

September 23, 1998

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Docket Management Facility [USCG-1998-3786]- 58
U. S. Department of Transportation, Room PL-40 1
400 Seventh Street SW
Washington, D.C. 20590-0001

Subject: Commercial Diving Operation; 46 CFR 197

Re: Advanced Notice of Proposal Rule-making; Docket USCG-19983786

Dear Sir:


Ocean Advanced Research, as an active and concerned member of the Association of Diving Contractors (ADC) encourages and recommends that the USCG to accept and implement the changes and revisions to 46 CFR 197 as submitted by the ADC.

The ADC comments and recommendations, to be submitted directly by that organization in response to Questions 1 thru 14 of ANPRM, Docket **Ref:** USCG-1998-3786, has been reviewed by this company, and it is in our opinion that the questions raised by USCG have been answered in a manner that will promote greater safety in the commercial diving industry. We further believe that adoption and implementation of the ADC recommendations are 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 responses to reference ANPRM, be, as a minimum, quoted in the resulting rule-making document as a primary reference for the conduct of commercial diving. In fact, this company would urge 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 may be appropriate. Only after approval by a consensus of the members and the Board of Directors are changes promulgated. This process is intended to make provisions for advances in technology, change to industry operating practices, **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 USCG.

Sincerely,



Keith Van Meter, M.D.
President