



# JACK VILAS & ASSOCIATES, INC.

*Commercial Diving Equipment & Supplies*

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Docket Management Facility [USCG-1998-3786] -65  
U.S. Department of Transportation, Room PL-401  
400 Seventh Street SW  
Washington, DC 20590-0001

Subject: Commercial Diving Operations; 46 CFR 197

Reference: Advanced Notice of Proposed Rulemaking; Docket USCG-1998-3786

### COMMENT

Jack Vilas & Associates, inc., as an active and concerned member of the Association of Diving Contractors, wishes to encourage 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 Coast Guard have been answered by the ADC 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.

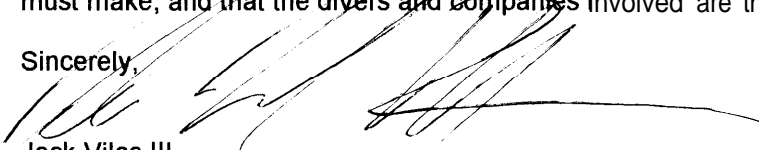
The ADC Consensus Standards for Commercial Diving Operations, (and any future revisions), should at least be quoted and listed in the resulting rulemaking document as a primary reference for the conduct of commercial diving,

But I truly believe, for the following reasons, the best action the Coast Guard could take would be 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 may be appropriate. Only 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 through manner and, at no cost to Coast Guard.

As a member of the technical and USCG revision committees, an active equipment supplier, and an ex-offshore worker, I feel strongly about safety and the advancements that commercial diving must make, and that the divers and companies involved are the right people to do this.

Sincerely,

  
Jack Vilas III  
President  
Jack Vilas & Associates, Inc.

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OCT 9 1998  
FBI - NEW ORLEANS