

**OCEANEERING**

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October 22, 1998

Docket Management Facility (USCG-1998-3786) - 68  
U.S. Department of Transportation, Room PS-401  
400 Seventh Street SW  
Washington, DC 20590-0001

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

Gentlemen,

I had written you a letter last month on behalf of Oceaneering International, Inc., with our recommendation that the Coast Guard accept and implement the changes and revisions to 46 CFR 197 as submitted by the Association of Diving Contractors. I now simply wish to elaborate on this position.

I have personally been associated with the ADC since its inception in the early 1970's. From mid-1969 until 1983, I was an active Diver, Supervisor and Superintendent for one of the founding members, Continental Diving Service, Inc. Even in those early years, I appreciated the cooperative posture of the ADC member companies in their principled goal of setting aside personal company agendas in order to recognize and address diving safety concerns. Needless to say, during those years all commercial diving "rules" were defined on a company-to-company basis. Predictably, the accident/DCS incident rates were astronomical when compared to today's standards. Much, if not most, of this dramatic improvement is a direct result of the ADC's efforts to "set the standard" for safe diving practices.

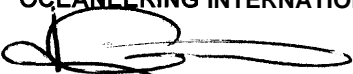
I have noticed that a lot of the present resistance to the proposed changes, -case in point, Jacksonville Towing,- addresses the same concerns that the ADC community faced in the early 70's. Quite simply, compliance with safe diving practices can be somewhat expensive. However, it's still the right thing to do. Many of the ADC member companies raised this very issue when the ADC Consensus Standards were being formulated. Nonetheless, and for the sake of diver safety, all of the ADC membership is now in compliance with the minimum standards. We now have a better, safer work environment for our divers as a result of this industry cooperation.

Oceaneering International has been a member of the ADC since its inception and has dedicated thousands of hours of senior manager's time and tens of thousands of dollars of our company's profits to support the cause of the ADC, as have the other supporting members. I'm currently acting as the 2<sup>nd</sup> Vice President for the ADC, on behalf of Oceaneering. In a practical sense, I have an extremely demanding responsibility to Oceaneering's business and do not have any spare time to volunteer to the ADC. Nonetheless, in spite of my own business obligations, I'm determined to support the organization with both my time and our company's financial resources. It's a commitment to a right-cause.

Quite simply put, the purpose of this letter is to try and illustrate Oceaneering's belief in the long-standing credibility of the ADC organization. The membership of the ADC is made up of competitors, both large and small, inland and offshore, who have opted, for over 25 consecutive years, to "check their personal/business agendas at-the-door", set aside ego's, and sit down as a team to improve the general safety of the diving community. So far, it has worked quite well. I trust that the US Coast Guard will have the wisdom to recognize the past achievements, on-going efforts and future goals of the ADC during their evaluations of this very important revision process.

Sincerely,

**OCEANEERING INTERNATIONAL, INC.**

  
Jerry Gauthier  
Vice President  
Americas Region

JAG/ggj