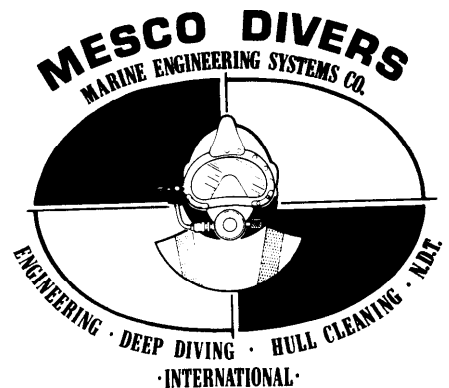


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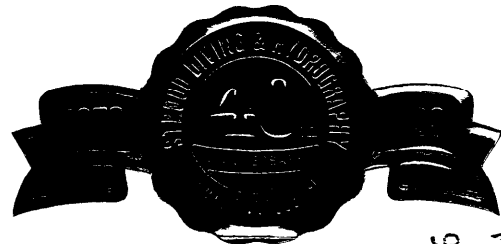


STROUD DIVING & HYDROGRAPHY
A DIVISION OF
MARINE ENGINEERING SYS. CO., INC.
5030 Old Kings Road
Jacksonville, FL. 32254 - 1184
Phone (904) 355-1777 FAX (904) 353-3261



October 16, 1998

Department of Transportation
US Coast Guard
Docket Management Facility
Room PL 401
400 Seventh St SW
Washington, D.C. 20593-0001



Ref: **USCG-1998-3786 - 7C**

Proposed Changes to 46CFR 197 Commercial Diving Regulations

Dear Lt. Kalina;

Our company was founded in 1953 and has served the marine industry for 45 years under periods where there was little or no regulation until today, where active professional groups such as the Coast Guard and the Association of Diving Contractors exist. The ADC has an International Chapter and an active interest in diving operations globally. The ADC Technical Committee has spent two decades refining the Consensus Standards for Commercial Diving. The standard is quite flexible in its ability to service Scuba, Surface-supplied Air, Surface-Gas, and Saturation diving needs throughout our industry. Our company has followed the ADC since its inception. We have been members in the past, but are not currently members.

In cases where the ADC Consensus Standard was more stringent than the 46CFR 197 or the 29CFR 1910.430 OSHA Diving regulations, the Consensus Standards are met. An example is the requirement of supplying a decompression chamber for dives to 80 feet sea water or deeper, where the other regulations call for the chamber at 100 feet. Our company supports the ADC Technical Committee's ability to make careful decisions regarding the industry's manning requirements, technical standards, operations management, and criteria for safe operations.

The ADC Consensus Standards address current modern issues such as Dynamically Positioned vessels and work with Remote Operated Vehicles. The 46CFR 197 has not been significantly revised in twenty years. It is my professional opinion that the US Coast Guard *should adopt the ADC Consensus Standards* in the interest of public safety.

○ American Bureau of Shipping ○ Lloyds Registry of Shipping ○ Bureau Veritas ○
○ Nippon Kaiji Kyokai ○ Det Norske Veritas ○ Germanischer Lloyd ○
American Society of Mechanical Engineers - Society of Professional Engineers - National Association of Corrosion Engineers
Society of American Military Engineers - Marine Technology Society - American Society of Naval Engineers - American Welding Society
Institute of Industrial Engineers - American Society of Non-destructive Testing

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The best possible manner for the Coast Guard to propose regulation of Bell Bounce Diving, Diving Operations from Dynamically Positioned vessels, contaminated waters, and other situations is the adaptation of the Consensus Standards.

By establishing minimum standards for diver training and presenting minimum curriculum, additional commercial diving schools and training centers may be established. The industry suffers from a shortage of trained, competent divers. I believe that the ANSI-ACDE current regulations address these minimums well and there is no need for the Coast Guard to duplicate the requirements. The current commercial diving schools produce entry-level commercial divers. The Coast Guard could enter into the field of Diving Supervisor licensing which would provide the industry with better trained supervisors, with credentials produced from proven educational and technical skills testing.

Our company is a small business as defined by the USSBA and we engage operations primarily in the engineering field. Diving has been primary endeavor for 45 years. We have taken the necessary steps to assure compliance with all regulations and take safety issues quite seriously. The monetary impact to our business would be very minimal since we are very well outfitted with decompression chambers (5) and other items which would be required for compliance.

The only critical areas foreseen is the apparent inability to regulate the sport Scuba diving industry and the dives made to extreme depths with mixed gas and no chambers on site, compliance, or adherence to regulations- There are commercial entities operating and competing within the commercial diving industry whom also conduct diving operations well outside the parameters of the 29CFR 1910.430, the 46CFR 197, and the ADC Consensus Standards. They appear to hide under the recreational or scientific clauses and escape compliance. Let us proceed with the adoption of the Consensus Standards and stabilize the standards for everyone. Without a USCG adoption, the ADC can really only regulate its members' safe diving programs and the non-members will continue to operate outside the parameters of the safety regulations.

We further believe that the industry as a whole will significantly benefit from the adoption of the Association's Consensus Standards. We should present a certain level of standards and require compliance for all. Please feel free to contact me with any questions you may have.
(904)355-1777

Sincerely,

Will F. Hux, P.E.
VP