



COLLEGE OF OCEANEERING

47828

December 7, 1998

DEPARTMENT OF TRANSPORTATION

98 DEC -8 PM 1:45

DOCKET SECTION

Docket Management Facility
USCG - 1998-3786-67
U. S. Dept. of Transportation
400 Seventh Street, SW, Room PL-401
Washington, DC 20590-001

USCG-98-3786-76

To Whom It May Concern:

Please accept this correspondence as the College of Oceaneering's response to the comments made by Mr. Ross Saxon on October 15, 1998 on behalf of the Association of Diving Contractors. It is the position of the College of Oceaneering that the ADC's comments fall short of the true actions and purposes of our institution.

In reference to paragraph three of Mr. Saxon's letter, I would like to submit the following comments.

The American National Standards Institute (ANSI) for divers meets strict oversight criteria by ANSI, including consensus of the diving industry. The ADC fails to explain the ANSI methodology used, including the canvassing process of organizations, companies' government agencies, individuals, as well as the entire ADC membership' etc., serving the diving industry. The **ACDE/ANSI** Minimum Standards were established to ensure the safety of the divers, and should be the ADC's criteria, to safeguard that young men and women entering the commercial diving field do so with the appropriate training and expertise.

The ADC member companies should be prohibited from hiring graduates from just any school that does not meet the minimum standards. The idea of using minimum standards within the marine industry is not a new idea, and is used in several other branches of the commercial diving industry.

December 7, 1998
Page two

In conclusion, I respectfully request a public hearing to discuss the controversies openly and fairly, to ensure that the resultant Coast Guard rule-making will include the proper education in diver safety and competency training.

Sincerely,

A handwritten signature in black ink, appearing to read "Alek Haidos". The signature is fluid and cursive, with a large initial "A" and "H".

Alek Haidos
Vice President

c. Commandant (G-MSO-2)
Lt. Diane Kalina
Office of Operating and Environmental Standards
USCG Headquarters, 2100 2nd St., SW
Washington, DC 20593