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# DIVERS ACADEMY OF THE EASTERN SEABOARD, INC.



DEPT. OF TRANSPORTATION  
DOCKET SECTION

December 7, 1998

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SW, Room PL-401  
Washington, DC 20590-00 1

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To Whom it May Concern:

Please accept this correspondence in response to the comments submitted on October 15, 1998 on behalf of The Association of Diving Contractors by Mr. Ross Saxon. It is my observation that the current comments submitted from the ADC (Association of Diving Contractor) "Contractors" contradict the mission of the ADC "Communication- Safety-Education" as stated on their printed letterhead.

In my 18 years of association with both the ADC "Contractor" and the ACDE (Association of Commercial Diving Educators) "Educators" it is apparent that again the position of the Contractors has changed several times over the years based on need. The recent growth in the industry is currently causing one of the largest demands for working divers in recent years. However, this should not sway our judgments in developing safe practices in our industry.

Secondly, The ANSI/ACDE Commercial Diver Training Standard supports the requirements of the Coast Guard regulations and The ADC Consensus Standard. The primary purpose of these standards is to provide safety within the commercial diving industry by assuring young divers entering this industry have the necessary knowledge to be able to protect their own safety as well as the other members of the dive team in any work experience they will encounter. This requires standardization of training requirements and training programs.

The ANSI /ACDE training standard should be applicable to all divers wishing to work in the commercial dive industry. The "Loop Hole" days have to stop. Death and Injuries have to be reduced. Having a training standard supports these efforts. As a injury/death trend begins to appear, research can be done and the standards can be updated.



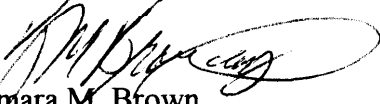
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The recent revisions to the ANSI/ACDE Standard -01-1998 were evident as a commercial diving school opened in the early 1990's in New York, training commercial divers in 40 hours. It was quickly discovered that this brief course could give a false sense of security to the divers as well as the contractors, causing injury/death. Therefore, with the support of the ADC a revision was made to add a minimum clock hour requirement to the standard. No sooner were the revisions approved by ANSI and the industry started a market gain requiring more qualified commercial divers and ADC changed their view to the required clock hours.

It is obvious that the ADC has misrepresented itself in an attempt to strong arm the process. Therefore, it is respectfully submitted, only through a public hearing can the primary mission of diver safety be accomplished.

Respectfully yours,  
Divers Academy of the Eastern Seaboard, Inc.

  
Tamara M. Brown  
President

cc: John Schwitters, Vice President, ACDE

Commandant (G-MSO-2)  
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