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June 8, 1999

RADM James C. Card  
VICE COMMANDANT U.S. COAST GUARD  
2100 Second Street SW  
Washington, D.C. 20593-0001

**USCG-98-3786 -79**

Dear Admiral Card,

The US Coast Guard is presently **evaluating** comments made pursuant to **their** "Advanced Notice for **Public** Rulemaking," (ANPRM), Docket USCG-98-3786-2. It's **my** understanding that the purpose of this Proposed **Rulemaking** is to revisit the regulations contained **within** 46CFR 197.200. Subpart B, Commercial Diving Operations. originally adopted in 1978.

As a part of the current ANPRM, the general public is being asked several questions about the trade organization, Association of Diving Contractors (ADC) **and whether** the ADC's existing Consensus Standards are an acceptable industry standard upon which the USCG can rely on to base their proposed regulations. Predictably, there has been some minority **resistance from** the certain people. in our opinion these negative comments would most likely come from A.) individuals or companies concerned with the financial implications (both extra cost and potential profit opportunities) inherent **with modern** and safe diving practices -for esample, those people wanting to "cut comers" by not using the minimum **3-man** dive teams, back up equipment, and proper safety apparahis - and B.) individuals and organizations who believe that the USCG should take on the added responsibility for **certifying** Divers and Diving Supervisors so they can offer "exam courses" in order to make a little extra. We believe that neither argument has reasonable merit .

Oceaneering International was a founding member of the ADC and has remained in good-standing and a strong supporter of this organization since 1972. History has **proven that** the use of the ADC Consensus Standards, working in concert with the USCG CFR197 regulations. has resulted in a dramatically reduced accident rate in the unique underwater work environment. **Furthermore**, this unique alliance of government and industry has brought order into an industry that was historically unregulated.

The purpose of this letter is to request that you bring forth your considerable influence to help support the ADC in its efforts to work with the USCG by way incorporating the ADC Standards into the USCG regulations. Through our ongoing and cooperative efforts. the ADC Standards have continued to evolve and arc now even better suited to serve as a foundation for the **USCG's** minimum requirements for commercial diving operations. For your information. the ADC membership currently consists of 349 member companies. 197 of which are General Members (those who furnish commercial underwater services) **in 27 different nations**. Domestically, virtually all of the large **and** credible diving contractors in the United States are members of the ADC and. accordingly, pledge to abide by their comprehensive Standards.

I thank you in advance for your consideration of support for this very **worthwhile** cause. Feel free to contact me at any time if I can be of assistance. Thanks.

Sincerely.

John R. Huff

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U.S. Department  
of Transportation

United States  
Coast Guard



United States Coast Guard  
Commandant

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**JUL 2 1999**

Mr. John R. Huff.  
Oceaneering International, Inc.  
11911 FM529  
Houston, Texas 77041-3011

Dear Mr. **Huff**:

This is in response to your letter of June 08, 1999, to VADM James C. Card, Vice Commandant, U. S. Coast Guard. Your letter provides valuable information for our diving regulatory revision project. I thank you for the input and can assure you that the suggestions will be considered as we assess and revise the current standards on Commercial Diving Regulation. Your letter will be placed on public docket USCG-98-3 786-2.

The Coast Guard looks forward to your organization's participation in the rulemaking to revise Coast Guard requirements for the safe operations of commercial diving. If you have **further** questions regarding this matter, please contact LT Diane Kalina or LT Charles Srioudom, Project Managers, at 202-267-4570.

Sincerely,

A handwritten signature in black ink that reads "M. A. Prescott".

M. A. Prescott

Commander, U.S. Coast Guard  
Chief, Vessel and Facility Operating  
Standards Division  
By direction of the Commandant