



## International Marine Contractors Association

*Represents offshore marine and underwater engineering companies*

5 Lower Belgrave Street, London SW1W 0NR, United Kingdom

VAT Registration No: GB 65 333 9823

Tel: +44 (0) 20 7824 5520

E-mail: [imca@imca-int.com](mailto:imca@imca-int.com)

Fax: +44 (0) 20 7824 5521

Web: [www.imca-int.com](http://www.imca-int.com)

2 March 2009

Docket Management Facility (M-30)  
US Department of Transportation  
West Building Ground Floor  
Room W12-140  
1200 New Jersey Avenue SE  
Washington, DC 20590-0021  
USA

For the attention of Lieutenant Commander Rogers Henderson

Dear Sir

### **IMCA (International Marine Contractors Association) Comments on the Advanced Notice of Proposed Rulemaking for Commercial Diving Operations Docket: USCG-1998-3786**

IMCA is pleased to respond to the invitation to comment on the Advanced Notice of Proposed Rulemaking for Commercial Diving Operations.

As identified in the Notice in the Federal Register, the US Coast Guard (USCG) received recommendations for commercial diving regulatory improvements from the National Offshore Safety Advisory Committee (NOSAC) in 2008. The recommendations were developed by a diving sub-committee set up by NOSAC and chaired by Andy Lundy. IMCA was pleased to participate in the work of the sub-committee and to work together with the other sub-committee members representing diving contractors, commercial diving industry groups and oil companies, and IMCA is fully supportive of the NOSAC recommendation to USCG.

In preparing its recommendations, the NOSAC diving sub-committee considered the guidance currently available from commercial diving groups, such as IMCA and the Association of Diving Contractors International (ADCI), and such guidance forms the basis of the recommendations put forward.

IMCA confirms its interest to work with USCG on diving and any other marine operations issues to improve safety and efficiency at any time.

Yours faithfully

Jane Bugler  
Technical Director