Recommendation: Licensing of Diver Supervisors.

Reasoning: The ADCI has clearly shown it inability to ensure compliance with CFR's (it cannot self regulate its member companies and has no procedure to do so)

- 1) The Coast Guard should issue Licenses for all levels of Dive Supervisor/Superintendent and the Life Support Supervisor on Saturations Diving systems. All other licenses/certifications would be issued by Approved Third Party Training Facilities (Tender, Diver Air, Gas and Saturation. A-LST and LST's would get their training and Certificate from these schools
- 2) These Licensee, the Dive Company they are working for and the Company Contracting the Diving service, should be subject to fine for infraction of CFR's. The Dive Supervisor or Life Support Supervisor could lose loss their license for serious infraction.
- 3) In the progress of any job no licensed person may be relieved for other then cause or personnel need. This would include the Licensed Vessel Captain, Dive Supervisor and Life Support Supervisor. Standard practice is: Remove a Dive Supervisor or Boat Captain that won't do what he believes to be un-safe. They then replace them with someone that will.
- 4) The Coast Guard needs to establish a program of un-announced inspection of Job site, with the potential of shutting down the job site and fines as required

In conjunction with the above:

Testing for both Dive Supervisor and Life Support Supervisor, established by both the ADCI and IMCA, needs to be taken out of their hands. I believe those test are only good in the basic diving physics. Other than that, the vast amount of their testing only serves ADCI and IMCA as a power base.

If the US Coast Guard and the British Health and Safety Executive, HSE, were able to establish a joint criteria for testing Dive Supervisor and Life Support Supervisor. It would give the international Oil & Gas Companies the consistency of operation that they need for safety and profit. These companies are the biggest contractors of diving operations. I believe they would support a move in this direction.

## My Basic Diving Resume:

Born 11/16/42: I am currently a working diver, surface air/gas and a saturation supervisor. My current position is Senior Supervisor/Diver for Legacy Offshore LLC. I was a member of Underwater Demolition Teams 21, UDT 11 and SEAL Team 1. I went to work for Taylor Diving and Salvage the end of 1969 as a tender and broke out at Taylor Diving in 1970. I have also worked for Sub Sea, Comex, J. Ray McDermott, Tennessee Valley Authority, Global, Martech, Offshore Petroleum Divers, Cal Dive and too many small companies, some of them very good, to name. I taught rigging, open tanks, harbor and burning for one year at the College of Oceaneering. I authored "Oxy-Arc Underwater Burning Class", a 90-minute training video and manual, for Oceans Technology. If I were evaluating myself in this business it would be: good divers, that will leave the next diver well, burn with the best of them. I am proudest of having

never bent or injured a diver. I have been running dive's from 1969, when the tender did the job. I have been supervising since 1977.

Sincerely John Carl Roat Senior Supervisor/Diver



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