



James Charles Spangler

This is a Comment on the **Coast Guard** (USCG) Rule: **Commercial Diving Operations**

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Comment Period Closed

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Comment

I find it unbelievable that Directive Number CPL 02-00-151 effective date June 13, 2011 still does not address concerns for minimum requirements for surface-supplied air pertaining to 29 CFR 1910.425(c)(4)(i), (c)(4)(ii), and (c)(4)(iii): that a standby diver is not always required (c)(4)(iv): that a reserve breathing-gas supply is not always required at the dive location (c)(6): that a diver-carried reserve breathing gas supply is not always required. With minimum manning, this would allow two dive team personnel topside unable to assist the diver in the water or for the diver to assist himself if he becomes trapped/entangled and unable to readily surface upon loss of his primary breathing-gas supply. This is totally unacceptable for the safety of the diver. The personnel are there. Put the equipment and the requirements there. 10 fsw or more than 100 fsw: Murphy's Law = anything that can go wrong will go wrong!!! History has proven this again and again . . . diving accidents and fatalities over the years are the only justification needed to mandate these requirements for all surface-supplied diving.

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