



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

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### Submitter Information

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# Comment

#### 197.264

References to "Equivalent Air Depth" need to be changed to read "Residual Nitrogen Time". Equivalent Air Depth is totally irrelevant when discussing the practice of Repetitive Diving, which the noted section is.

### 197.282

Should stipulate 5 - point harness. Anything less than a 5-point harness is considered unsafe in most countries where commercial diving operations are performed. The US should be no different.

### 197.285

(a) and (c) should be changed to read 25%. Anything in excess of 25% oxygen is considered "pure oxygen" according to the United States Navy. Every regulatory agency world-wide has the same opinion.

## 197.286

Depth gauges (properly called pneumofathometer gauges) should be accurate to .25% over the range of the gauge, and should be calibrated by a third party twice annually.