These drill requirements though well-meaning and needed will cause undue burden on the industry unless the wording is changed to reflect how our industry works: see Highlighted areas.

• Table 197.220(f)—Drill Requirements

Requirement	Detail
Ensure that each dive team member can perform his or her assigned dive team duties	Drill at least once every 30 calendar days, before initiating a commercial diving operation at a new dive location, when adding a new member to the dive term or whenever you change an emergency drill procedure or emergency response equipment described in the operations manual. Note: For each dive mode used, drill using the unique equipment, personnel, and operational procedures required by that mode.
Diver recovery	At least once every 90 days, drill on: (1) Deployment of standby divers; (2) recovery of a diver from depth to a decompression chamber and first aid station; and (3) for dive systems utilizing hyperbaric rescue chambers or hyperbaric rescue craft, a full launch and recovery drill at least every 90 days or when adding a new member to the dive team or when initiating a new dive location.
Emergency rescue	Drill at least once every 30 calendar days. Ensure that personnel can successfully deploy the equipment and perform the procedures described in the operations manual for emergency rescue (it is not necessary to deploy the emergency aviation resources or vessels required to transport divers to offsite medical facilities).