



Garry Shields

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

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Due May 20 2015, at 11:59 PM ET

Comment

Rule Proposal contained within 46 CFR Parts 8 and 197 [Docket No. USCG-1998-3786]

Specifically:- Mandatory Issuance of IMO Diving System Safety Certificate IMO A.831(19)

The A.831(19) is an IMO Statutory Certificate (although categorized by the IMO as non-mandatory).

Thus:

The only route to issuance is either by the vessels Flag Administration (FA) or on behalf" of the FA by a Recognized Organization (RO). Many FAs operate through ROs, some exclusively (example the VMA -Vanuatu). In almost all cases the RO is the vessels specific Classing Society (CS).

The Classing Societies that have been canvassed (ABS/DNV)* have advised that they will NOT issue the subject certificate on behalf of the FA if the Diving System is unclassified, REGARDLESS of the Diving Systems SPECIFICATION and ARRANGMENTS.

Thus:

This rule proposal CLEARLY creates a PREJUDICIAL BIAS against many Saturation Diving Systems and ALSO to the commercial entities that operate the same.

*LR have yet to revert on subject. However it cannot be expected that they will have a differing position.

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