

 **Anonymous**

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

14 years experience Commercial Diver
Member Dock Builders and Divers Union
Qualified Surface Gas Diver

I have refused repeated attempts of both inland and offshore companies to get me to supervise. It comes down to no enforcement of current regulation and only the dive supervisor is held responsible.

I am in agreement with Mr. Roats comments on 197.220 Commercial diving operators Pg. 94 through 197.251 Pre-operational verification. Pg. 109 are a vast improvement over current CFRs.

One area of Responsibility needs to be added. Client or Customer of Commercial Diving Services;

Why:

(1) Most Contractors of Commercial Diving Services that come under jurisdiction of these proposed CFRs Participate in the Job Plan. That job plan/scope of work will be put together by the contracting companies Project Manager and the Project Manager of the diving company winning the contract. Many times the Dive Supervisor/Dive Crew will have no input.

(2) There is an offshore Representative of the Contraction Company on every job. They have the power to remove any Dive Supervisor or any other member of that dive crew for any reason.

(3) These same contracting companies require the diving contractor to sign a hold harmless clause before they will issue a contract for work.

I am also in total agreement with Mr. Roat on his request to the Office of Management and Budget.

I request that the Office of Management and Budget: Direct the Coast Guard and OSHA to come to agreement on one of two options.

1) OSHA bring their Commercial Diving CFRs in line with the higher

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standard in the Coast Guard CFRs or at a minimum

2) OSHA become a member of: Bureau of Safety and Environmental Enforcement (BSEE) Interagency Collaboration

I am also a signature of the below Petition (currently 2104 signers) and wish to state: We need enforcement and investigation!

Petition:

No. 1 regards the OSHA and Coast Guard investigation and reporting:

We the undersigned, require that the Coast Guard and OSHA, as regulatory bodies for the commercial diving industry, be charged with the investigation and reporting of all incidents occurring on any commercial diving operation in a timely manner.

No. 2 removes the 3 man team.

We the undersigned, require that a minimum five man team manning level be a requirement of law, and must consist of:

One certificated diving supervisor

One certificated diver

One certificated standby diver

Two qualified diving tenders

We also require that for mixed gas diving operations, an additional dedicated surface gas rack operator be mandatory.

No. 3 regards Dive Supervisor (certificate) Licensing:

We the undersigned, require the Coast Guard and OSHA set up a Licensing system for Dive Supervisors. It should have legal standing under law. This license should be revocable and the licensees subject to law for gross negligence. At this time a SCUBA Certification has more standing under U.S. Law than an ADCI or IMCA Supervisor Card.

See: <http://www.gopetition.com/petitions/protect-commercial-divers-lives.html>