

**Dive** – should say a hyperbaric exposure.

**Mixed-gas dive** – is unclear as written, giving an air diver nitrox during decompression would be considered mixed-gas diving under this standard. Mixed-gas usually refers to the type of bottom mix received by the diver, usually a Helium and Oxygen mixture. Nitrox if given as a bottom mix is also considered mixed-gas diving in some jurisdictions. The decompression mixture should not be included in this definition.

Add *Risk Assessment* before the *Risk Management* definition.

**197.202 – for incorporation by reference:** All references should read “current issue or revision”. For example, as written ASME PVHO-1-2013 would be the standard even though ASME regularly updates their standards.

**197.203 Equivalents:** there should be a general process to follow for this.

**197.209 Third-party audits:** Surely the USCG may decide the standards for a third-party carrying out audits on their behalf. However this section creates an industry that does not currently exist and excludes those other than ex-commercial diving supervisors. In this case engineers and other highly qualified personnel would not be considered for service.

**197.211 External audits:** this would be incredible expensive and burdensome to the commercial diving companies. There are no other instances where a qualified licensed company must go through a series of third-party audits to perform work. This would make the diving contractor beholden to a third-party for work.

**197.212 Pre-audit notification:** the notification time period is onerous and places undue burden on the diving contractor as they normally work on short time frames.

**197.214-197.219 Commercial diving operators: Table 197.220(f) (i)** all dive team members may not be available for each meeting as most diving project has two shifts. Revise to say all “relevant” dive team members – or wording of that sort.

**Table 197.220 (k) – Dive Notice, Required Contents:** Diving system safety certificate – most diving systems in the US do not have this type of certificate. There are only a few agencies that issue them.

**197.224 Operational duties in the event of marine casualty or serious marine incident (3):** this would make the dive company hire a third-party auditor for every incident above a first aid. No other industry is held to this burdensome standard. This may be appropriate for a marine casualty but not a serious incident as defined in the standard.

**197.252 Work hours:** this should just include ADCI consensus standards by reference.

**197.265 Operations in which a diver’s decompression is required, but has been omitted:** The US Navy may be used as a guideline but the final word is comes from the company’s diving physician.

### **197.270 General requirements**

(d) This would prove burdensome as by this definition all diving systems must be classed. Very few modular diving systems in the US are classed.

(e) (1) many vessels use hyperbaric life boats as secondary chambers to decompress divers that may be ill or injured. As written smaller saturation vessels would have to stop all operations when using their life boat to safely decompress, say, a diver with a sore throat or cold. This would be the equivalent of having larger saturation vessels to stop the process of using a "split-system". Either premise would entail pressing a chamber or life boat down. As long as the total number of divers in the chamber does not exceed the number of persons the life boat or HRC is rated for and the HRC is locked on to the system that is all that should matter.