



Brian McLaughlin

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

I have many concerns regarding these new rule changes as does the other union representatives in the commercial diving industry. The concerns that I have as a union representative from the New York/New Jersey Metropolitan are are:

The new rule changes reference dive work on the outer continental shelf. Will this effect the diving in the harbors, bays, and rivers which I will refer to as shallow water?

Why didn't we come up with separate rules? I believe there should be separate rules to the specific areas that commercial divers are working?

Why does it seem like the ADCI's suggestions are the only suggestions being looked at? There are approximately 3,000 commercial divers nation wide. The United Brotherhood of Carpenters and Joiners of America represent approximately 1100 of those divers. I feel our input should have played an active role in these rule changes.

Everything refers back to the ADCI and their ideas and suggestions. Does this mean that the diver or the contractor must be an ADCI member? All of the references refer back to third party auditors, which is the ADCI. How does someone become a third party auditor?

Helmet inspections should be required according to the manufactures specifications.

Define what is considered diving under U S Coast Guard regulations, Navy Regulations, Army Corp of Engineers regulations, and OSHA regulations. A better idea would be one standardized rules specifically written out defining the rules.

Why are referencing SCUBA in commercial diving regulations? SCUBA diving should be a separate entity by its self.

The referenced wages were not correct. The unionized commercial

ID: USCG-1998-3786-0148

Tracking Number: 1jz-8ic1-23wd

Document Information

Date Posted:

Apr 21, 2015

RIN:

1625-AA21

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divers make a lot more money. Their wages were not referenced.

I feel that not all commercial diving affiliates and contractors were not equally involved in these regulations.

I have attended three of the NOSAC hearings as a union commercial diving representative. Our concerns were skipped over at one hearing in Houston.

I feel these regulations should be reevaluated so every association, agency, and contractors have a voice. It all seems one sided to me.
