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Ref: USCG Commercial Diving Operations

April 7, 2015

Attn:

Re: NPRM

Bisso Marine, LLC is pleased to submit the following recommendations for the Proposed Rules. After a careful review of the questions that are referenced we have come to the conclusion of the following recommendations to the USCG based off the concluded findings of the Bisso Marine, LLC team.

We have addressed the 1st Question with the team referencing SCUBA Dive Team:

We called for an evaluation of the question by our Diving Department. We asked on a individual basis for recommendations based on the new Proposed Rule. We addressed the conditions where the diver may be exposed to include the visibility, current, and depth of the diver.

- The use of Scuba for Commercial Diving is not a viable solution . I do not feel that Scuba Diving rules and regulations should never be brought into the commercial diving scope of work. .

The 2nd Question with the (DMT) Dive Medical Technician .and their need during Commercial diving operations:

- I believe a DMT should be available on every dive project. They have an understanding of the potential risks and injuries that divers are exposed to. These personnel also understand the terminology someone may be using to describe and incident/event or its cause. If needed they can be pressed into a deck chamber and will be comfortable in the work environment and have the capabilities to operate all the equipment as needed.

We agree with this ruling based on the fact that we follow all safe work practices. We belong to and follow and IMCA as well as USCG Guidelines with all diving operations.

- I do not feel there is a relative need for the USCG to be involved in the auditing process of commercial diving operations. We are already audited to a higher standard than the USCG regulates by our clients, IMCA, and ADC. The USCG does not need to be involved in the auditing secondary to the other entities have a more in depth history with the diving operations and follows an International set of procedures that has been the guidelines for Commercial Diving for years.

Sincerely,

Chris Moore
Diving Manager