



William Kraus

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 would like to bring attention to page #78 General, 197.200 paragraph (3) 33cfr part 2, 2.36

Lets leave the wording as it is with the intention to cover us all. It shouldn't matter how much a diver is paid, nor how many divers are in your organization, an emergency does not discriminate.

Make the ADCI standards for us all across the board!

Those that don't agree with the five man team standards can't even follow the three man team standards, there fore their input should be skipped over.

With the page #78 general in play it'll be fair across the board for all, especially we the divers who risk our lives to bring a profit to the contractor or non-diver collecting our contributions who is supposed to ensure us a safe work site.

If pay cuts are in order because the new standards will "price us out of the market", Then let me be the first to except a pay cut so I'll be able to live and cash my pay check that I earned by risking my life to bring a profit to my employer. Or instead of a pay cut, eliminate the non-diver middle man.

No matter what the depth, the human body can't breath underwater! make these rules applicable to harbors, bays, and rivers which I will refer to as "shallow water".

I would have to agree that the ADCI standards are fair to all, and the best safety practice for the industry whether it be offshore, inland, or in a mud puddle.

OSHA needs to step up and show some teeth and ensure us a safe work environment.

Thank you,
Bill Kraus
Commercial Diver

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P.S. That was easy!