Comment No.	Section/para	Comment Description
1	**197.201/Definition**	*Bell* means a compartment either at ambient pressure (open bell) or pressurized (closed bell) that allows a diver to be transported to and from an underwater work site, allows the diver access to the surrounding environment, and is capable of being used as a refuge during diving operations. Remove *"Bell"* definition. Add *"Closed Bell"* and *"Open Bell"*. *Closed Bell - A pressure vessel for human occupancy which is used to transport divers under pressure either to or from the underwater work site. Also known as a submersible decompression chamber.* *Open Bell - A basket with a closed top section which is capable of containing a dry gaseous atmosphere to provide a refuge for the divers. It is not a pressure vessel.* **There are significant differences between a closed diving bell and an open bell. The ADCI CS (IBR) clearly separate them.**
2	**197.201/Definition**	*Commercial diving operator or CDO* means any person or entity that employs, contracts, or secures the services of commercial divers to undertake commercial diving operations. Change *"CDO"* definition. Recommend changing CDO to CDC; ***Commercial Diving Contractor.*** ***Be more concise regarding the definition. The contractor is the employer of the diver. The Client, or end user of the service is nothing more. Hiring the services of divers does not make one the Operator of said services.***

Comment No.	Section/para	Comment Description
3	**197.201/Definition**	Add *"Client"* definition. **Recommend staying away from the term "Operator" as the client is not always an oil or gas Operator.** *Client – A company, or entity, that enters in an agreement to utilize the professional services of a Commercial Diving Contractor.*
4	**197.201/Definition**	*Dive* means work performed by a diver or the activity that is taken in support of that work and that is the subject of a dive plan. Change "dive" definition. Recommend changing to read; "*Dive" means any person, or persons, exposed to hyperbaric conditions performing work or tasks that are the subject of a dive plan."* **The way that "dive" is proposed to be defined encompasses anyone operating equipment in support of the dive.**
5	**197.201/Definition**	Add *"Management of Change (MOC)"* definition. *Management of Change (MOC) – A process that addresses changes to organization, personnel, systems, procedures, equipment products, materials or substances, that are not "replacement in kind".* *The MOC process ensures that the impacts of changes that affect the health and safety of personnel, or threatens the environment are properly recognized, reviewed, approved, communicated and documented.* ***See 30 CFR Chapter II Subchapter B Part 250 Subpart S 250.1912***

Comment No.	Section/para	Comment Description
6	**197.201/Definition**	*Mixed Gas Dive.* *Mixed-gas dive* means a dive mode in which the diver in the water is supplied with a breathing gas other than air. **This needs to be refined to be specific to HEO2 diving, not enriched air such as Nitrox.** **Definition of Mixed gas diving states "other than air" this will unintentionally make many "air" dives fall under the regulation of a mixed gas dive. "Air" dives routinely use gases other than air, 50/50 decompression mixes in the water, enriched air and/or nitrox. Mixed gas in the GOM industry generally refers to HeO2 diving and the definition should reflect this.**
7	**197.201/Definition**	Add *"Hyperbaric Rescue Unit (HRU)"* definition. *Hyperbaric Rescue Unit (HRU) - A unit whereby Divers under pressure can be safely evacuated from a ship or floating structure to a place where decompression can be carried out. This is used to describe a HRC or SPHL.*
8	**197.201/Definition**	Add *"Self-Propelled Hyperbaric Lifeboat (SPHL)"* definition. *Self-Propelled Hyperbaric Lifeboat (SPHL) - The SPHL is a PVHO fitted in a conventional lifeboat hull, making it a hyperbaric rescue unit capable of maneuvering under its own power with the ability to accommodate a support crew. The SPHL must have the ability to sustain the maximum capacity of divers for 72 hours.*
9	**197.201/Definition**	Add *"Hyperbaric Rescue Chamber (HRC)"* definition. *Hyperbaric Rescue Chamber (HRC) - The HRC is a towable hyperbaric rescue unit. It is a PVHO that is not housed in a conventional life boat and has no capability to accommodate a support crew. The HRC must have the ability to sustain the maximum capacity of divers for 72 hours.*

Comment No.	Section/para	Comment Description
10	**197.201/Definition**	Add *"Hyperbaric Rescue Facility (HRF)" definition.* *Hyperbaric Rescue Facility (HRF) - The HRF is a facility capable of accepting an HRU where the divers can be transferred under pressure to receive medical attention and safely complete decompression.*
11	**197.201/Definition**	Add *"Life Support Package (LSP)"* definition. *Life Support Package (LSP) - The LSP is a self-contained package of supplies and equipment kept in a predetermined location dedicated to support the HRU in the event of a hyperbaric evacuation. The LSP must be mobilized quickly to provide the necessary support to the HRU.*
12	**197.201/Definition**	Add *"Hyperbaric Evacuation Plan (HEP)"* definition. *Hyperbaric Evacuation Plan (HEP) - The comprehensive planning document that describes the methods, the processes and the procedures used to evacuate saturation divers away from a stricken diving system to a safe refuge where decompression can be carried out.*
13	**197.201/Definition**	Add *"Hyperbaric Evacuation System (HES)"* definition. *Hyperbaric Evacuation System (HES) – A system used for the purpose of evacuating divers under hyperbaric conditions. The system is made up of various parts which may include the Hyperbaric Evacuation Plan, the Hyperbaric Rescue Unit, the Hyperbaric Rescue Facility, the Safe Haven and anything else that is used in the planned hyperbaric evacuation.*

Comment No.	Section/para	Comment Description
14	**197.201/Definition**	Add *"Safe Haven"* definition. *Safe Haven - It should be understood that it may not always be possible, or practical, for an HRU to travel to a land based HRF. Contingency plans should include an alternate site. This could be a saturation Diving Support Vessel, a platform, a vessel with sufficient crane capacity or another clearly identified option. This site will provide a safe haven to carry out the decompression and provide logistical support.*
15	**197.201/Definition**	***Risk management measure*** means the assignment of additional or different personnel, equipment, or other resources, the implementation of effective policies or practices, or any other measure appropriate for the management or reduction of risks that may be anticipated during a dive. Recommend changing *"Risk Management Measure"* definition to *"Risk Assessment"* to align with industry terminology.
16	**197.201/Definition**	Add *"Job Safety Analysis (JSA)"* definition. *Job Safety Analysis (JSA) - a technique used to identify risks to personnel associated with their job activities. The JSAs are also used to determine the appropriate mitigation measures needed to reduce job risks to personnel. The JSA must include all personnel involved with the job activity.* ***See 30 CFR Chapter II Subchapter B Part 250 Subpart S 250.1911***
17	**197.201/Definition**	Add Manifold Operator *Manifold Operator - Individual, such as an LST, diving supervisor or mixed-gas diver, who is designated to perform the duties of gas distribution on a surface-supplied mixed gas (HeO_2) diving operation, who is experienced and trained in the operation of the manifold, and whose*

Comment No.	Section/para	Comment Description
		primary responsibility is to operate the manifold. *For HEO2 diving the manifold operator should be designated by the supervisor.*
18	**197.201/Definition**	*Serious marine incident* has the meaning defined in 46 CFR 4.03–2. **See 46 CFR 4.03-2** **Definition Serious Marine incident - the definition is clear but incident and accident are used interchangeably throughout the document and accident is undefined. "Accident" in the document should be changed to "incident".**
19	**197.201/Definition**	*Add "Tabletop Exercise" definition.* *A tabletop exercise is an exercise which is designed to test the theoretical ability of a group to respond to an emergency situation. Tabletop exercises can be used to identify gaps in a plan and they promote cooperative thinking among teams.*
20	**197.202/IBR**	(d) American Society of Mechanical Engineers (ASME) (1) ASME PVHO-1 **(2) Recommend adding *ASME PVHO-2*** (3) ASME B31.1 (4) ASME National Board Inspection Code Reworded to stay away from dates or date specific revisions
21	**197.202/IBR**	(b) Association of Diving Contractors International, 5206 Cypress Creek Parkway, Suite 202, Houston, TX 77069, *http://adc-int.org/*. (1) International Consensus Standards for Commercial Diving and Underwater Operations, 6th Edition, 2010 (''ADCI Standards'')

Comment No.	Section/para	Comment Description
		Recommend changing to read "*International Consensus Standards for Commercial Diving and Underwater Operations, Most Current Edition ("ADCI Standards")*
22	**197.202/IBR**	(e) American National Standards Institute (ANSI), 25 West 43rd Street, Fourth Floor, New York, NY 10036, *http://www.ansi.org.* (1) ANSI/ISO 15618–1:2001, Qualification testing of welders for underwater welding—Part 1: Diver welders for hyperbaric wet welding (''ANSI/ISO 15618'') *Recommend removal of ANSI/ISO 15618-1:2001 and refer to American Welding Society (AWS) D3.6 M:2010 or most current edition*
23	**197.203/Equivalents**	(a) The Commandant may accept substitutes for equipment, materials, apparatus, arrangements, procedures, or tests required in this subpart if the substitute provides an equivalent level of safety. (b) The person or entity receiving the equivalency determination must keep a copy of that determination and make it available to any of the person's or entity's employees, an approved third party organization, or Coast Guard personnel upon request. **What is the process for variance or substitution requests?**
24	**197.209/Third party Audits**	**This section would mean creating an auditing industry that does not currently exist.** **Making 3rd party inspections mandatory leaves the diving contractor responsible for yet undetermined and possibly exorbitant costs and delays from 3rd party auditing companies that will be created and have a government mandate behind them.**

Comment No.	Section/para	Comment Description
25	**197.211/External Audits**	Each CDO, and vessel or facility owner that permits a commercial diving operation to take place on board, must have an external compliance audit conducted by an approved TPO at least twice in each 5 year period. **We need clarification on the external audits.** **Also need to understand if this is only USCG inspected vessels, or any facility or vessel within USCG jurisdiction?** Will a platform or rig require this external audit? How does this apply to MODU's that permit diving operations from their decks 1-2 times for every 5 years, or on an "as needed" or short notice basis? What about CDO's that "spot hire" USCG approved vessels on short notice for their operations as needed? Most diving contractors do not own their own vessels, and must contract USCG approved vessels as needed. Will all vessels in the GoM be required to undergo these additional audits in the event that they are hired?
26	**197.212(a)/Pre-audit notification**	(a) Each commercial diving operator (CDO) or vessel or facility owner that permits a commercial diving operation to take place on board must notify the cognizant Officer in Charge, Marine Inspection (OCMI) at least 5 working days before the start of any external audit conducted under 46 CFR 197.211. **Flexibility should be added to this paragraph to allow for short weather windows, scope changes, short notice jobs, and urgent tasks.** **This happens FREQUENTLY.** **This regulation could negate working during seasons of the year when plans are made on less than a 5 day weather forecast and subsequently *severely* impact the diving contractors.** **Do other industries under USCG jurisdiction have**

Comment No.	Section/para	Comment Description
		such restrictions?
27	**197.213/Audit Reporting**	(d) CDO's must retain copies of TPO audit reports and make them available for examination by the USCG upon request. No timeframe is mentioned for retention of documents. Recommend changing to *"CDO's must retain copies of TPO audit reports for a minimum of XXX and make them available for examination by the USCG upon request."* **It would be difficult to keep copies indefinitely.**
28	**197.220/CDO (e)**	(e) The name of the dive supervisor for each commercial diving operation is provided to the person in charge (PIC) of the vessel or facility before beginning the operation; Recommend changing to: *"The name of the diving supervisor(s) for each commercial diving operation shall be—* *(a) Designated in writing; and* *(b) Given to the person-in-charge prior to the commencement of any commercial diving operation.* **This is the language that exists in the current 46 CFR 197.210 and should remain in place. The Designated Person in Charge of Diving Operations (DPIC) has become the norm.**
29	**197.220/CDO**	Table 197.220(f) – Drill requirements Recommend removing and replace with:  197.220 Drills rev 1.docx

Comment No.	Section/para	Comment Description
30	**197.220/(i) CDO**	Table 197.220(i) This is excellent, just recommend adding ***applicable*:** All ***applicable*** dive team members participate in a dive planning meeting before each dive, that the meeting ensures that a dive plan is prepared specific to each dive identifying the person in charge of the vessel or facility, the dive supervisor, and the roles and responsibilities of all dive team members, the anticipated conditions and risks that could affect the dive and risk management measures implemented to reduce risks; and that each dive team member reviews and signs the plan to document participation in the meeting and agreement with the plan **The addition of the word "applicable" will allow off shift dive team members to rest during 24 hour operations.**
31	**197.220/(k) CDO**	(k) The local Officer in Charge, Marine Inspection is provided with a dive notice containing the contents specified in table 197.220(k) of this section at least 24 hours before any commercial diving operation begins. Contact information ..... For the CDO, dive supervisor, and PIC: Name, telephone or e-mail, or other contact information. Date and time ..... Scheduled start and end date and time. Dive location ..... Geographic position (latitude and longitude). Diving system safety certificate ..... Certificate number, date of expiration, flag administration, and issuing authority if other than the administration. **(if applicable)** Mode ..... Mode of diving to be used. Support platform ..... Name of each vessel or facility providing dive support. Work ..... Description of work to be performed including maximum depth and exposure time. **MOST diving systems do not, and will not have a diving system safety certificate.** **Certifying current systems to "Class" and/or buying systems that are pre-certified are extremely cost prohibitive to most contractors.** **How would all existing (yet compliant and safe) diving equipment owners meet this requirement?** ***This could be financially ruinous to a majority of diving contractors in the GoM* and would leave the dive contractor at the mercy of a 3rd party for availability and cost.** ***Recommend that all diving systems and equipment***

Comment No.	Section/para	Comment Description
		are COMPLIANT to ADCI, IMCA, or equipment guidelines.
32	**197.221/PIC**	(c) The PIC must – (1) Participate in the dive plan meeting and sign the dive plan. Recommend changing to: *(1) Participate, or have a designated alternate in writing participate, in the dive plan meeting and sign the dive plan.* Reason: It is not reasonable to have the PIC (vessel master) attend every dive plan meeting around the clock. Note: Most diving contractors do not own vessels, meaning the PIC could be the Master of a vessel contracted by the CDO, and have little understanding of how diving operations are conducted.
33	**197.222/Dive Supervisors**	(l) Keep a record in the dive log noting where and when testing occurred for each of the following, along with the test results (1) Medical kit check (monthly) (2) Air compressor test; (3) Breathing mixture check; (4) Breathing supply system check; (5) Cleaning of diving equipment for oxygen service, including which equipment was cleaned, the general cleaning procedure, and the names of persons involved; (6) Breathing supply hose and system tests; (7) Breathing gas supply system inspection; (8) Depth gauge and timekeeping device test; (9) Pressure vessel for human occupancy test and inspection; (10) Diving equipment inspection; (11) Pressure piping test and inspection; and

Comment No.	Section/para	Comment Description
		(12) Volume tank and cylinder test and inspection; see next page Recommend changing to: *(l) Diving Contractor is to provide the diving supervisor with a certification book that identifies where and when testing occurred for each of the following, along with the test results. Diving Contractor is to maintain records for a minimum of five years.* **The Diving Contractor is responsible for ensuring the equipment is properly maintained. The dive supervisor should be given this information so it can be reviewed and challenged as needed. The diving contractor must have a competent person sign off the testing.**
34	**197.223/Operations Manual**	(a) Each dive supervisor must provide the operations manual to the person in charge (PIC) prior to commencement of any diving operation and make it available at the dive location to all members of the dive team. Note: Most diving contractors do not own their own vessels, meaning the PIC could be the Master of a vessel contracted by the CDO, and as a non-diving 3rd party, the PIC may have little understanding of how diving operations are conducted. Although the operations manual should be available to all at the dive location, providing one to a 3rd party PIC may not be practical.
	197.223/Operations	(b) The dive supervisor must modify the operations manual

Comment No.	Section/para	Comment Description
	Manual (cont.)	to reflect any change in the configuration or operation of the vessel or facility or in the specific diving operation as planned. Recommend changing to: (b) *A **management of change** process will be followed for any changes in the configuration or operation of the vessel or facility or in the specific diving operation as planned.* **The Dive Supervisor will never change the operations manual. A company typically has (1) primary Operations Manual.** **Even if this were meant to say "dive plan, project execution plan or a project procedure", the MOC process should still be required to ensure changes are implemented correctly.**
35	**197.224/ Operational duties in the event of marine casualty or serious marine incident.** **197.224/ Operational duties in the event of**	(3) Arrange for a timely post-casualty audit to be conducted in accordance with 46 CFR 197.211; CFR-2008-title46-vol 1-sec4-03-1.pdf CFR-2008-title46-vol 1-sec4-05-1.pdf This requires a 3rd party audit prior to returning to work following a marine casualty or serious marine incident. A serious marine incident is defined as: "An injury to a crewmember, passenger, or other person which requires professional medical treatment beyond first aid and, in the case of a person employed aboard a vessel in commercial service, which renders the individual unfit to perform routine vessel duties." Under this, a diver receiving a lionfish sting that becomes infected, a treatable DCS case, or the damage of an expensive piece of equipment will trigger the shut-down of the job, and the sequester of vessel and equipment until a 3rd party auditor can be sourced and becomes available. *This could be financially ruinous and would leave the dive contractor at the mercy of a 3rd party for availability and cost.* The current reporting and investigation requirements and the proven cooperation of the industry does not lead me to

Comment No.	Section/para	Comment Description
	marine casualty or serious marine incident.	believe that this new regulation would prove beneficial, and it could actually be harmful. Currently, in the cases of truly serious diving incidents, contractors work with the USCG and at its direction until released.
36	**197.243/Divers and Dive Tenders**	(c) In lieu of the requirements in section 3.7.3(a) and (b) of the ADCI Standards (incorporated by reference, see 46 CFR 197.202), a saturation diver must complete at least 200 dives as an air or mixed-gas diver; and complete at least 100 dives as a mixed-gas diver. **This is in reference to saturation dive certification.** Recommend removing the text "*and complete at least 100 dives as a mixed-gas diver*" **Reason: There is less HEO2 surface diving today than in the past as these projects are being pushed to shallow saturation.**
37	**197.246/ Individuals conducting underwater burning, welding, or exothermic cutting.**	Each individual conducting underwater burning, welding, or exothermic cutting must provide the commercial diving operator and dive supervisor with documentation showing successful completion of a course for underwater welding, burning, and cutting containing curriculum based on ANSI/ACDE–01–2009 (incorporated by reference, see 46 CFR 197.202) and successful completion of a written and practical exam based on ANSI/ISO 15618 (incorporated by reference, see 46 CFR 197.202). ANSI/ISO 15618-1:2001, Qualification testing of welders for underwater welding is antiquated and in the process of being rewritten. **AWS D36.B is a more up to date and a better publication for the purpose cited.** **Reference ADCI CS 5.31 or current ADCI CS**

Comment No.	Section/para	Comment Description
38	**197.246/ Individuals conducting underwater burning, welding, or exothermic cutting.**	ANSI/ISO 15618-1:2001, Qualification testing of welders for underwater welding. This document is antiquated and in the process of being rewritten. **AWS D36.B is a more up to date and a better publication for the purpose cited.** **Reference ADCI CS 5.31 or current ADCI CS**
39	**197.252/Work Hours**	Each commercial dive operator and dive supervisor must ensure that each dive member is provided the opportunity to obtain at least 12 hours of rest within any 24-hour period, except in an emergency or drills that may be required in accordance with 46 CFR 15.710(d).  ADCI Rest Policy 5-15.pdf **Recommend changing to IBR ADCI Section 5.15 - Minimum Rest Hour Policy**
40	**197.261/Operations conducted from a dynamic positioning vessel.**	(3) Ensure that the onboard dive location is not located within 5 meters of a propulsion source. Recommend removing this part, as it adds no value and may cause confusion. The ADCI section 8.3.9.1 states “Main umbilical must be 20 feet shorter that the closest hazard”.
41	**197.263/Operations Involving Scuba**	Recommend “*Outside its use in Scientific and Archaeological diving, there are unlikely to be any circumstances where surface supplied equipment cannot be used, therefore scuba diving under USCG commercial diving jurisdiction should be considered an unsafe working practice*”. **The process for requesting to use scuba for Scientific and Archeological purposes would still need to be defined, but there are no clear reasons why surface supplied can’t be used for all commercial purposes under USCG jurisdiction.**

Comment No.	Section/para	Comment Description
42	**197.265/Omitted Decompression**	Commercial diving operators must ensure that the procedures identified in the U.S. Navy Diving Manual, Sixth Edition (incorporated by reference, see 46 CFR 197.202) are followed when a diver's decompression is required but has been omitted. Recommend changing to read: *When a diver's decompression is required but has been omitted; the commercial diving operator must ensure that there are procedures in place and followed. The U.S. Navy Diving Manual, Sixth Edition (incorporated by reference, see 46 CFR 197.202) should be used as a minimum. Other equivalent or more conservative treatment plans/tables may be used or the treatment orders of the company's Diving Medical Officer may be followed.* **For instance, the diving contractor's Diving Medical Officer, or hyperbaric physician, will normally direct the diver be treated above a Table 5, which is the US Navy Diving Manuals treatment requirement.**
43	**197.270/General Requirements**	Recommend adding NOSAC HES Focus Group language, or a modified version of it.  Saturation Diving Addition.docx
44	**197.270/General Requirements**	(d) A modular or packaged commercial diving unit placed aboard a vessel for use in a commercial diving operation must have documentation indicating that the unit and its installation have been reviewed and approved for its intended use by a recognized classification society that meets the requirements of 46 CFR part 8, or by another organization acceptable to the Office of Design and Engineering Standards, Commandant (CG ENG). Need to revise, or at least clarify, this language. If the USCG is requiring classed systems, is it in reference to saturation diving systems, air diving systems, or both?

Comment No.	Section/para	Comment Description
		The way the paragraph reads, it seems to call for the classing of all diving systems (modular or packaged). This would be unduly burdensome on the industry and financially unachievable (and ruinous) for many small to medium diving companies and operators using small modular surface diving spreads, and would leave the dive contractor at the mercy of a 3rd party for availability and cost. By calling for class on surface diving spreads, the regulations are incorporating by reference hundreds of rules and standards of the classing society's, not applying to just equipment but procedures, training, record keeping, etc. **Recommend moving toward classing of the saturation diving systems only, but ensure that surface diving spreads are compliant with ADCI, IMCA, etc.**
45	**197.270/General Requirements**	(e) Where a hyperbaric lifeboat is provided as an emergency evacuation system it must— (1) Be used for no other purpose; (2) Not be counted to meet applicable carriage requirements for survival craft; (3) Meet the hyperbaric evacuation system requirements of IMO Resolution A.692(17) (incorporated by reference, see 46 CFR 197.202); and (4) Be type-approved by a recognized classification society as defined in 46 CFR 8.100, or issued a Coast Guard approval certificate under approval series 160.135. Recommend changing to: *(e) In the use of all saturation diving systems, a hyperbaric rescue unit must be provided and —* *(1) Be used for no other purpose;* *(2) Not be counted to meet applicable carriage requirements for survival craft;* *(3) Meet the hyperbaric evacuation system requirements of IMO Resolution A.692(17) (incorporated by reference, see 46 CFR 197.202); and*

Comment No.	Section/para	Comment Description
		(4) Have an HEP **The purpose of the revised proposed language is to encompass all Hyperbaric Evacuation Systems and to be clear of the requirement to have a Hyperbaric Evacuation Plan.**
46	**197.271/ Commercial diving operator's general equipment duties**	(c) (4) Manufacturer service life specifications, including the equipment's date of entry into dive service and recommended date of removal from service. Recommend removing this section. If all other requirements of this section are met, then the equipment's service dates, especially recommended removal, serve no purpose. Some contractors use interchangeable parts, such as engines, major compressor parts, winches, tanks, etc., each having different dates. Equipment could pass all manufacturer and industry related tests and function perfectly, or even have very little use, yet still be operated past the manufacturer's removal date. Regular and required testing and maintenance (all documented) should be sufficient.
47	**197.272/PIC Equipment Duties**	Recommend removing this section and add to 197.222/Dive Supervisors (see recommended language for 197.222/Dive Supervisors)

Comment No.	Section/para	Comment Description
48	**197.275/Volume Tanks**	(1) Is equipped with intakes located away from areas containing internal combustion engine exhaust fumes or other hazardous contaminants; Recommend moving this requirement to a dive compressor section (does not exist currently). A volume tank will not have intakes, but a volume tank may be part of a compressor. The ADCI CS (IBR) has sufficient language to cover this subject in section 6.
49	**197.277/PVHO**	(d) Each closed bell must have a life support capability for the intact closed bell and its occupants for: (1) Twelve hours after an accident severing the umbilical to the surface when the umbilical to the surface is the only installed means of retrieving the closed bell; or (2) A period of time, at least equal to 1 hour plus twice the time required to retrieve the bell from its designed operating depth and attach an auxiliary life support system, after an accident severing the umbilical to the surface when the umbilical is one of the two independent installed means of retrieving the closed bell, each meeting the requirements of this paragraph (d). **Recommend removing this language and refer to ADCI Consensus Standards (IBR) 6.12.2.3**

Comment No.	Section/para	Comment Description
50	**197.280/Diving ladders and stages**	(c) Each diving stage must have an open-grating platform and must be available for a diver to enter or exit the water from the dive location and must be available for in-water decompression if the diver is— (1) Wearing a heavyweight diving outfit; or (2) Diving outside the no decompression limits, except when a bell is provided. This paragraph calls specifically for the use of "open-grating platforms" on stages. There are many acceptable alternatives to grating and the reference to open-grating should be replaced with "freely draining platform" or similar. Recommend removal of outdated language, "heavyweight diving outfit". There are inland areas that may still use this gear, but it will not be used in a commercial activity in USCG jurisdiction.
51	**197.286/Miscellaneous equipment requirements**	*Breathing gas supply, diver reserve*, the last sentence; "*unused ports must be capped off to prevent unintended loss of water tight integrity*". This line is used also as the last line in the two blocks below this one and it does not apply to *Breathing gas supply, primary* or *Breathing gas supply, and secondary*. It can be removed from the last two.
52	**197.286/Miscellaneous equipment requirements**	**Equipment used with oxygen mixtures greater than 23.5 percent by volume**. This should read greater than 50 percent by volume to be in line with 197.285 of this document and the ADCI CS (IBR). This would be in line with 40% low pressure O2 mixtures for use and clean of flammable materials. Anything greater than 50% is "oxygen use only".

Comment No.	Section/para	Comment Description
53	**197.290/Dive Team Staffing**	TABLE 197.290—Minimum Dive Team Staffing Size and Composition Surface-supplied diving, mixed-gas – 5 - Dive supervisor, Diver, Tender (see note 2), Standby diver (see note 1), Standby diver tender (see note 3). (d) Mixed gas commercial diving operations must include a life support technician dedicated for the purpose of operating the mixed gas system. Recommend changing to read: *(d) Mixed gas commercial diving operations must include a designated manifold operator for the purpose of operating the mixed gas system.* An LST, as defined in this NPRM, may not be qualified to run a surface diving mixed gas rack.
54	**197.290 Dive Team Staffing**	**Saturation Diving - With the exception of the supervisors and technicians, one member of the team shall be a diver medical technician. Recommend DMT be a mandatory part of the dive team on surface supplied air/mixed gas diving operations where decompression is anticipated/required. Recommend risk assessing the issue of having only one DMT on the diving rotation. For example, if the DMT gets injured while diving, how does the incident get addressed? **197.247 Diver medical Technicians –** Defined very well.
55		