



Jeff Birchfield

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

As the standard is written now under 46 CFR 197.202(a) under applicability the standard states:

This subpart applies to commercial diving operations taking place at any deepwater port or the safety zone thereof as defined in 33 CFR part 150; from any artificial island, installation, or other device on the Outer Continental Shelf and the waters adjacent thereto as defined in 33 CFR part 147 or otherwise related to activities on the Outer Continental Shelf; and from all vessels required to have a certificate of inspection issued by the Coast Guard including mobile offshore drilling units regardless of their geographic location, or from any vessel connected with a deepwater port or within the deepwater port safety zone, or from any vessel engaged in activities related to the Outer Continental Shelf; except that this subpart does not apply to any diving operation

- (1) Performed solely for marine scientific research and development purposes by educational institutions;
- (2) Performed solely for research and development for the advancement of diving equipment and technology; or
- (3) Performed solely for search and rescue or related public safety purposes by or under the control of a governmental agency.

The Proposed Standard would include the language Vessel operating on the navigable waters of the United States, as defined in 33 CFR part 2.

If the proposed language is adopted, this rule would be applicable in all navigable waters of the US. This would affect many inland diving companies and would lump these companies into a standard that I believe was put together for Offshore Operations primarily. ADCI International Consensus Standards For Commercial Diving And Underwater Operations 4.3.1 Surface Supplied Air Diving 0-100 fsw WITH NO DECOMPRESSION calls for a minimum 3 man dive team. If the rule was written as is and a contractor was diving on navigable waters at any depth they would be required to operate with a 5 man dive team minimum.

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Was Navigable Waters intended to be included under applicability and

if so does the Economic Impact Survey conducted capture the impact that this would have in regards to Manning and Equipment that would be applicable for all dives conducted in Navigable waters?