


**Comment from Delise, Bobby; Divers Association International**

This is a Comment on the **Occupational Safety and Health Administration (OSHA) Notice: [Standard on Commercial Diving Operations; Extension of the Office of Management and Budget's \(OMB\) Approval of Information Collection \(Paperwork\) Requirements](#)**

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The Divers Association International believes its comments to the Office of Management and Budget on Docket ID: USCG-1998-3786-0150 applies to Docket ID: OSHA-2011-0008-0016 Information Collection (Paperwork) Requirements.

*No documents available.*

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**Submitter Information**

**Submitter Name:** Bobby Delise

**Country:** United States

**Organization Name:** Divers Association International



Divers Association International to the Office of Management and Budget

**Reference:** Docket ID: USCG-1998-3786-0116

Dear Sir or Madame:

Please accept this correspondence being sent on behalf of our membership, which at this point is nearly two thousand. They are commercial divers and diving support personnel, both offshore and onshore. The Divers Association International does respectfully request and implore the United States Government that due consideration be given to consolidating all authority over Commercial Diving under the United States Coast Guard.

Lives have been lost, careers ended and families have been impacted because of the confusing myriad of governmental oversight and management of diver safety. It is our opinion that the United States Coast Guard is manned, equipped and managed to provide the finest oversight of diver safety, and it is the USCG that has the best chance to reduce fatalities and heartbreak.

Many years have passed since appeals were first made to clarify and improve the regulations for Commercial Diving operations. Individuals, unions, diving companies and attorneys have long held that the multiplicity of regulatory agencies and the disparities between their regulations have contributed to creating and sustaining unsafe practices in the Diving Industry. Many appeals for ending the overlap of authority and eliminating conflicting regulations and jurisdictions have been made to the United States Coast Guard, OSHA, BSEE (and its predecessors) to rectify situations which have and continue to cost lives.

After reviewing decades of facts, there can be no argument that commercial diving incidents and fatalities have become lost in the statistical haze of classification with totally disparate professions. This is unacceptable. No one can quantify the danger of the industry when the data is mixed with incidents in unrelated work. Consolidating all regulatory, audit, inspection, investigation and penalty authority is the most effective method of improving the safety and productivity of Commercial Diving.

The Divers Association International proposes that all authority over Commercial Diving operations be consolidated under the USCG mission. Time, money and lives are repeatedly wasted on ineffective programs with insufficient personnel or funds. Memoranda Of Understanding and other interactions between agencies of government have failed to attain the level of knowledgeable supervision a profession as technical and dangerous as Commercial Diving requires to move into the future.

Diver fatalities and severe injuries do not differentiate between venues. The physics of hyperbaric exposure that result in barotrauma and pressure-related illness are constant be the workplace located offshore on the OCS, The Gulf of Mexico, an inland harbor or one of the many rivers that cross our continent. What varies are the commercial considerations. Companies wishing to contain costs or to secure contracts by cutting corners on equipment, manning levels and procedures have repeatedly cost lives, severe injuries and hardship. Safe diving reverses this reality – period!

As long as multiple agencies and disparate regulations coexist, we will see the continuation of the injuries and deaths which have plagued Commercial Diving in the modern era. Inland diving gave birth to the decompression tables which revolutionized diving. The development of oil and gas resources along with military applications moved diving into unforeseen waters. The knowledge gained by Commercial and Military divers has been applied in the Space program. It is time to rectify the missteps of the last sixty years and recognize the seriousness of the situation. The relatively small number of people who dive makes for a small voice calling out for sorely needed improvements. The Commercial Divers in the United States provide essential services to the economy of this Nation. Petroleum, water supplies, shipping, power generation and the nuclear industry all depend on Commercial Diving to some extent. This influence reaches every life in the USA!

We of the Divers Association insist that immediate consideration is given to the consolidation of authority requested herein.

Respectfully



Bobby Delise, Legal Counsel  
Divers Association Int. Board Member

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