No part of a report of a marine casualty investigation shall be admissible as evidence in any civil or administrative proceeding, other than an administrative proceeding initiated by the United

States. 46 U.S.C. §6308.



March 27, 2018

Oceangate Inc



This letter is sent on behalf of our industry members who have collectively expressed unanimous concern regarding the development of 'TITAN' and the planned Titanic Expedition. Our apprehension is that the current 'experimental' approach adopted by Oceangate could result in negative outcomes (from minor to catastrophic) that would have serious consequences for everyone in the industry.

The MUV industry has earned itself an enviable safety track record over the past 40 years. This is partly due to the diligent engineering discipline and professional approach exercised by members of the industry, but also due to the collective observation of (and adherence to) a variety of safety standards. This reputation is solid because it was hard won over many years of diligence application and has resulted in a safe and successful record of operation. Our members are all aware of how important and precious this standing is and deeply concerned that a single negative event could undo this.

Your marketing material advertises that the TITAN design will meet or exceed the DNV-GL safety standards, yet it does not appear that Oceangate has the intention of following DNV-GL class rules. Your representation is, at minimum, misleading to the public and breaches an industry-wide professional code of conduct we all endeavor to uphold.

We do all agree that a performance-based testing program for design verification is a recognized and valid approach to new technologies. However, we recommend that at a minimum you institute a prototype testing program that is reviewed and witnessed by DNV-GL (or ABS). While this may demand additional time and expense, it is our unanimous view that this validation process by a third-party is a critical component in the safeguards that protect all submersible occupants.

Together we are all beneficiaries of the excellent safety record of MUV operations over the years; but each one of us is also a steward with a responsibility to sustain this achievement. We would be grateful if you could confirm that Oceangate can see the future benefit of its investment in adhering to our industry accepted safety guidelines and protocols for ultimate success and that of the MUV community.

Sincerely yours,	