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October 7, 1987 SAE Talking Points

I Background
- 1979 ANPR
- 1982 8 (a)
- Sept 84 NRDC petition
- Dec 84 granted: Requested information, invited comment

II Jan 29 1986 PR

Life cycle approach, all asbestos, not just brakes

Provisions, incl. examples of options

Further response to NRDC petition: granted

Comments /////
---------- Auto makers, brake manufacturers
Hearings /////

- Opposed permits, could live with delayed ban
- Some (many) substitute products available
- Catastrophe if Agency forced premature substitution
- Optimistic 5-year lead for OE

III ASME Report

OE - 5 years for most classes
Problem areas: AM
- Trucks: wedge brake blocks
  medium trucks
- Off-road vehicles

- Lack of stds for AM, safety issue
- Some performance problems with some subs

Govt: Consider qualification of AM
Assess how well non-asb can be used to substitute for asbestos in AM

IV Currently

Coordinating with DOT on regulatory options
DOT petition from American Trucking Assn -
Regulate AM tractor-trailer brakes
Updating support documents
Current industry trends
- Auto industry - substitution
- Brake industry - OSHA standard

Hazard of substitutes - Continuing to assess
Position - lesser hazard than asbestos
Development, selection of regulatory options; RIA November
Schedule July 1988