

information/communication and/or any discussion and/or dissemination thereof.

ANSWER:

Ford denies that there exists today any medical or scientific knowledge that establishes a causal relationship between exposure to the friction products contained in its vehicles and asbestos-related disease or illness. Nevertheless, on August 3, 1973, Ford issued a memorandum to Plant Safety Engineers directing that brake drums be cleaned using industrial type vacuum cleaners. That memorandum directed that air hoses should not be used to clean brake drums. Simultaneously, the Plant Engineering Office issued Maintenance Bulletin 137 to the same effect.

On October 24, 1975, Ford Technical Service Bulletin 99 was distributed to Ford and Lincoln-Mercury Dealers, recommending that a vacuum cleaner be used for cleaning brakes. In January 1976, a Technical Service Bulletin 104 was issued to the dealers indicating that Ford recommended the use of an industrial vacuum cleaner in brake cleaning operations. The 1977 edition of the Rotunda Catalog and Ford's Shop Manual for Dealerships recommended that brakes not be cleaned with an air hose and that a vacuum cleaner be used for this purpose. In November 1983, Ford issued Bulletin No. 83-22 on brake and clutch servicing. These documents are the results of corporate activity and are not the work of any single author. These bulletins have not been superseded. Also, Ford provided warnings about asbestos-containing components in its shop manual and service manuals.

With respect to the aftermarket brake linings and brake pads sold by Ford, for example, the Ford logo, as well as a label that reads along the following lines have been placed on cartons since 1980:

CAUTION: CONTAINS ASBESTOS FIBERS. AVOID CREATING DUST.
BREATHING ASBESTOS DUST MAY CAUSE SERIOUS BODILY HARM.
WHEN SERVICING THIS BRAKE LINING OR ANY COMPONENT