

h) Supply copies of reports of the research department, pertaining to the use by the corporation of asbestos in their manufactured products.

ANSWER: Ford objects to this Interrogatory as vague, over broad and unintelligible.

14. Please state whether any of the distributors of your asbestos containing products were provided with any special instructions, oral or written, in regard to utilizing said products in a manner so as to avoid exposing workers to amounts of dust exceeding the MAC or TLV. If so, please state:

ANSWER: Ford objects to this Interrogatory on the grounds that it is overly broad, vague, ambiguous, and seeks information that is irrelevant, immaterial, and not calculated to lead to the discovery of admissible evidence.

Subject to the foregoing objection, on October 24, 1975, a Technical Service Bulletin was issued by the Parts and Service Division to Ford dealerships recommending a vacuum cleaner be used for cleaning brakes. In January of 1976, a follow-up Technical Service Bulletin was issued to the dealers indicating that Ford recommended the use of an industrial vacuum cleaner in brake cleaning operations. The 1977 edition of 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.