

- Unrealistic lead times.
- Alternatives 1 or 2 would be more equitable.
- Exempt spare parts for earlier models.

Toyota

- Opposed to applying rule for replacement parts to earlier models.
- Against proposed phase-down over 10 years.
- Prefer staged ban.
 - Friction products--5 year lead time
 - Gaskets--10 year lead time
 - Insulators--5 year lead time

National Automobile Dealers Association

- EPA should consider a simple, streamlined model-year-based ban on new vehicle parts.
- Avoid regulating replacement parts.
- EPA should consider
 - Ban beginning in a given model year for new vehicles
 - No regulation of replacement parts
- EPA and manufacturer should determine year(s) of ban on different products.

American Motors Corporation

- Recommends
 - More realistic timetable
 - develop guidelines for exemption
- EPA should ban asbestos use in specific products, such as disc brakes, rather than a product category, such as friction material.
- Develop guidelines for exemptions.
- Lead time needs can only be adequately addressed under a product-specific regulation. This is major reason AMC opposes the phase-down scheme proposed by EPA.

Motor Vehicles Manufacturers Association

- Schedule for implementation must be contingent upon the availability of suitable substitute materials so that safety and braking performance are not compromised.
- Lead times proposed are unrealistic.
- MVMA supports "an exemption process for essential uses without substitutes".