

PROPOSED DRAFT

The Friction Materials Standards Institute Inc. is an association of most of the domestic brake lining and clutch facing manufacturers. We also service eighteen foreign manufacturers of friction materials. Asbestos is an important ingredient in most friction articles and the proposed revisions to the standard for occupational exposure to asbestos will have a major impact on this industry.

Our members support the concept of government regulation to safeguard the health of its workers, and with the cooperation of the worker this can be done. We feel there are sections in the proposed regulations--and the background data used for their development--that need comment.

The Institute has urged that the membership make individual replies in order to participate in this rulemaking. The Institute's comments will not cover certain subjects such as regulated areas and exhaust ventilation that can best be commented on by individual manufacturers. As an association, we cannot speak for all our members because certain proposals are controversial within our industry. Because of this we do not necessarily concur with those proposals on which we have not commented. We hope that individual members of the friction materials industry will comment directly to you on those subjects.