6.0 SUMMARY OF INDUSTRY RESPONSES TO PROPOSED BAN

6.1 Section Summary

Various concerns representing automobile manufacturers, truck and equipment manufacturers, friction product producers, and environmental groups responded with written comments to the Environmental Protection Agency's proposal outlined in the Federal Register. Table 12 lists the respondents.

In general, respondents commented on numerous facets of the proposal, but the comments most pertinent to this study were those dealing with issues of brake performance, application availability, and feasibility of the proposed phase-down schedule. The comments of respondents have been categorized in the following sections with respect to the issues addressed.

Table 13 summarizes in a very general sense the responses of the various industries and groups to the main features of the proposed EPA ban.

6.2 Concerns of Respondents to Issues of Brake Performance

The comments of the respondents to this issue are summarized in Appendix B. The automobile and truck manufacturers were consistent in their opposition to the proposed ban on asbestos in aftermarket friction products. These manufacturers contend that vehicle safety may be compromised if unproven friction products are used in place of vehicle-tested products containing asbestos. One truck manufacturer (Navistar) claims that brake and friction product qualification can take up to 48 months, so the time and cost of re-qualifying materials for other aftermarket products would be prohibitive.

Some manufacturers question the long-term performance of some asbestos-free materials and subsequently feel that further development will be necessary before a phase-out can be feasible. Ford Motor Company indicated that friction products must be qualified under long term conditions more stringent than federal motor vehicle safety standards in order to determine the sensitivity of materials to "hot-spotting" and "morning sickness". Rockwell International inferred that current non-asbestos