rose from 10.0% and 8.6% to 15.3% and 13.2% in 1974.

We believe that brake linings and brake blocks are in the class of products competitive with Wagner's St. Louis plant. If the proposed regulations add significantly to our members' costs, they will be at a price disadvantage with manufacturers in foreign countries where asbestos regulations are either less restrictive or not in effect at all. This imbalance in international occupational regulations could end up protecting the American worker at the cost of his job. It is a problem that should be called to the attention of not only the regulators and legislators, but the workers directly involved.

* * * * *

The Institute trusts that the Occupational Safety and Health Administration will consider these comments by the Institute. We trust also that comments received directly from friction materials manufacturers will be considered in your rulemaking, and we have asked our members to contribute.

If additional information is needed on any of the subjects raised by these comments, the Institute would be pleased to attempt gathering such information.

Respectfully submitted,

FRICTION MATERIALS STANDARDS INSTITUTE

E. W. Drislane

FMSI 03264