

- Recommend that a ban not take effect until after a period 10 years; and that the EPA permanently exempt aftermarket brake linings.

Volkswagen

- Beginning in 1987 model year, no asbestos brake linings on VW.
- Proposes Fixed Time Limits for new vehicles.

<u>Product</u>	<u>FTL</u>
Clutch	4 years
Transmission	4 years
Gaskets	4 years
Front disc brake pads (light duty)	4 years
Rear drum brake lining (light duty)	6 years
Medium and heavy duty brakes	10 years

Exemption allowed if non-asbestos substitutes not available. .

No permits needed.

- Exempt replacement parts.

Mercedes

- Ban only after 5 years.
- Including possibility of exceptions:
 - Indispensable with respect to replacement parts
- Gaskets, particularly cylinder head gaskets, may need even longer lead time.
- Alternative 1 is preferable over Alternative 2.
- If FMVSS-105 is revised, this might result in further delays.

Ford

- Introduce changes during model redesign.
- Ford supports reasonable fixed time table for removal of asbestos products, coupled with a procedure for exempting where no reasonable alternatives exist.
- Exemption for parts replacement.

Austin

- Anticipates lead time of 5 years to remove asbestos from its vehicles.