PLAINTIFF'S EXHIBIT
WH-946

COURT OF COMMON PLEAS
BUTLER COUNTY, OHIO

DONALD LEE ABNER, et al.,	)	Case No.: CV96-01-0180
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	
A-BEST PRODUCTS COMPANY, et al.,	)	
	)	
	)	
Defendants.	)	Hon. George Elliott

SUPPLEMENTAL ANSWER OF DEFENDANT WESTINGHOUSE ELECTRIC CORPORATION TO PLAINTIFFS' INTERROGATORY NUMBER 5

5. Has Defendant ever engaged in the mining, manufacturing, selling, marketing, installation or distribution of asbestos-containing products? If so, please state the following:

(a) The name of the company engaged in the activity (whether it is Defendant, Defendant's predecessor, or Defendant's subsidiary);

(b) As to each product mined, manufactured, sold, marketed, installed or distributed, please state the following:

(1) The trade or brand name.
(2) Its identification number (model, serial number, etc.)
(3) The time period it was manufactured, mined, marketed, distributed or sold.
(4) Its physical description including color, general composition, and form.
(5) A detailed description of its intended use and purpose.
(6) A detailed description of the type package in which it was sold, listing the dates of each type of package used, a physical description of the

package, and a description of any printed material or trademarks that appeared thereon.

(7) The percent of asbestos which it contained.

(8) The percent of asbestos by asbestos type (amosite, crocidolite, tremolite, anthophyllite).

(c) The time period during which each of these products were on the market;

(d) A description of the physical composition of each product;

(e) How each of these asbestos-containing product can be distinguished from those competitors;

(f) A description of the physical appearance of such product;

(g) A detailed description of the intended uses.

ANSWER:

Westinghouse incorporates by reference its Preliminary Statement and General Objections. Without waiving its objections, Westinghouse states that it is not, and never has been, a member of the asbestos mining and bulk insulation industry (commonly referred to as the "asbestos industry"). Westinghouse has never mined or milled asbestos ore or sold raw asbestos products. Further Westinghouse states that neither its present nor former subsidiaries has ever been a miner or miller of asbestos fibers.

Without waiving its objections, Westinghouse responds to this interrogatory in an attempt to identify and describe generally for the plaintiffs categories of products manufactured by Westinghouse that at one time or another contained asbestos.

It is not reasonably possible for Westinghouse to make generalizations regarding which model numbers or product types within a general product category contained or could

have contained one or more asbestos-containing components. For example, Westinghouse is unable to state that all electric motors designed to operate above a certain temperature or designed for a specific application would have contained asbestos prior to a certain date. The same is true for other pieces of electrical control apparatus such as switchgear, circuit breakers or transformers.

In order to determine whether a particular motor or piece of electrical control equipment contained asbestos, Westinghouse must be provided with a description of the product, its location and its application that is sufficiently specific for it to locate a type number, shop order number or model number for the product. This number is then cross-referenced to an engineering ("outline") drawing for that piece of equipment. The outline drawing provides a listing of all of the components or subassemblies contained within the finished product. Many pieces of electrical equipment can contain hundreds of individual components.

Each one of these individual components will typically have a separate engineering drawing that is cross-referenced by number on the outline drawing and shows how the component is manufactured or assembled and what other components are contained within it. The individual component drawings may cross reference additional sub-component drawings. Each level of engineering drawings must be reviewed to determine the number of the next engineering drawing below it in the sequence. The bottom level drawing in the sequence contains a reference to a material specification or process specification from which it can usually be determined whether the component covered by that drawing has ever contained asbestos. In some instances, however, drawings have been revised over time and earlier

revisions are not always available. In other cases, drawings or components may have become obsolete, and are thus no longer retained.

In any event, the process of determining whether any asbestos-containing components were incorporated into a finished piece of electrical equipment is a time consuming and labor intensive process. Engineers or consultants are usually needed to locate and interpret the many engineering drawings that need to be reviewed, which makes such an effort an expensive process as well. Because all product variations within a particular product category can, and often do, contain different components and materials, this process must be followed for each specific piece of electrical equipment.

Because of these practical limits, Westinghouse has attempted over time to obtain enough information about various products to be able to state upon reasonable belief which products, or categories of products, at one time or another contained an asbestos-containing component in some form. Because of the burden of this undertaking and the range of Westinghouse products as described above, Westinghouse cannot ensure that it has captured within its descriptions the full range of products ever manufactured by Westinghouse with asbestos-containing components. Westinghouse provides this information after reasonable inquiry of current and former employees and review of documents related to products. The reliability of the information in all of its details is dependent upon the interpretation of documents and the recollections of Westinghouse engineers and others concerning product compositions and applications. For this reason, Westinghouse cannot state with certainty that there would not be exceptions to the general descriptions or usage provided in its answer to this interrogatory.

Westinghouse believes that the best approach to securing information beyond that offered in the following response is for the plaintiffs to identify the products that they claim emitted airborne respirable asbestos fibers, with the maximum specificity possible, and for Westinghouse to focus its further response on the particular product at issue. As always, Westinghouse is prepared to undertake a reasonable search of its records for information concerning products that are so specifically identified that such a search would not be unreasonably burdensome and at the same time would provide the plaintiffs with relevant data.

Upon information and belief, the following is a list of the products sold to the public by Westinghouse that at some point in time may have contained some amount of asbestos, without regard to the type or amount of the asbestos fibers into the air. Further, ONLY CERTAIN TYPES OF THESE PRODUCTS USED FOR PARTICULAR APPLICATIONS CONTAINED ASBESTOS; MANY OTHER TYPES CONTAINED NO ASBESTOS. Westinghouse typically did not utilize trade names to refer to its products; these products were sold as Westinghouse products.

air conditioners and compressors
annealing furnaces
armatures
ballistic missile components
brakes for motors, bridge hoists, cranes and other industrial equipment and linings
combination paneling
condensers
control rod drive mechanisms
control equipment, including: air core reactors, arc chutes, bus duct, bushings, capacitors, circuit breakers, contactors, controllers, cutouts, fuses, fuse blocks power rectifiers, relays, resistors, rheostats, shunts, starters, switchboards, switches and switchgear
CPL arrester
CRC test press

drying oven
electrical insulating materials, sometimes sold under the brand name Tuffernell, including: treated and untreated asbestos cloth, treated and untreated asbestos paper, treated asbestos glass mat, asbestos tape, asbestos lumber, asbestos sleeves, asbestos cord, asbestos yarn, asbestos mica sheet and asbestos mica combination sheet
electronic tubes
elevators and escalators
flexible laminate
floodlights, aviation lights and light fixtures
gaskets in equipment
generators
governors
heat transfer products
heating coils
high voltage incandescent lamp, 230V
household appliances, including: clothes irons, fans, fluorescent lights, hair dryers, range timers, roasters, toasters and water heaters
induction heating equipment and systems
JF autostarter
lightning arrestors
liquid slip regulator
mercury lamp
mercury vapor rectifier
Micarta
molded line traps
molded parts for electrical equipment, including: spacer barrier, mounting or terminal blocks, electrical insulator sleeve, plug board, barrier support and coil shield
motors (split phase, traction, A.C., D.C., fractional horse, capacitors, single phase)
moveable building wall panels
moveable traffic bridge control
network protectors
oxygen analyzer probe assembly
oxygen shield
power reclosers
pumps and packing
railroad propulsion equipment, including: arc chutes and barriers, bases, contact supports, separators, support blocks, panel boards, resistors, cover liners and motors
reactor components
reduction gears
sleeving
SVS arrestors

steam and gas turbines and ancillary insulation
thermal demand meters
transducers
transformers
valves
ventilated cell diverters
welding electrodes
welding machines
wire wound resistor assembly

Westinghouse distributed through its former division, Westinghouse Electric Supply Company (WESCO), asbestos-containing products made by other companies. The following is a list of such products that Westinghouse has identified. There may have been other such products, which Westinghouse is unable to identify based upon the product information available to it.

American Beauty Heater Cord
Armored Thermostat Cable
Asbestos Insulated Heat-resisting Fixture Cord, type AF
Asbestos Insulated Wire and Cable
Asbestos Ranger and Rheostat Wire "Rockbestos"
Collyer Asbestos Heater Cord
General Cable Asbestos Insulated Fixture Wire
General Cable Asbestos Insulated Flexible Cord
Johns Manville Duxseal
Johns Manville "Transite" Asbestos-Cement Conduit Pipe and Fittings
Heater Cord Type HPD
Rockbestos Asbestos Varnished Cambric Wire Types ABC and AVP
Rockbestos Asbestos-covered Nickel Cord
Rockbestos AVC Boiler Room Wire and Cable
Rockbestos AVC Switchboard Wire
Rockbestos Heat Resisting Fixture Wire
Rockbestos Power Cable
Rockbestos Stove Wire
Rockbestos Table LH Hotbed or Industrial Heating Cable
Thermostat Cable

Westinghouse has been in business since the 1870s. It has manufactured countless variations of electrical motors, switches, transformers and electrical machinery for decades.

There was no reason to make a record of the first or last date on which any one of these many types of equipment first or last contained any amount of asbestos. As a result, Westinghouse is unable to provide this information.