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people who would be worried about all sorts of consequences to their work place and to their business. So it's not just about their health.
Q. Let's talk about a worker at a plant owned by Union Carbide's customer.
A. We can do that, but can I say --
MS. ROSENBERG: There actually isn't a question pending.
A. Let me just put one thing on the table. The materials that I'm going to use as a basis for testimony are really not about the circumstances of worker at plants supplied with asbestos by Union Carbide. That's not the nature of my task, and the nature of my inquiry was what was publicly available, not an inquiry about what was received. I couldn't do that kind of study and do the other one as well.
There may be someone else who has done it, but I haven't. And so any time I would qualify by saying that's not what I'm giving opinions about, I'm giving opinions about what was available, what was publicly available without being a psychologist at risk.
Q. Thank you. Sir, would you agree with me that when Union Carbide's customers

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receive information, the workers at Union Carbide's customers receives information or anybody receives information about health risks, the attention that they will pay to that warning changes depending on the gravity of the harm?
A. The gravity, if you mean by that, you mean the likelihood and the seriousness both? Yes.
MR. GIANARIS: I want to show you what we will mark as 9. This is Internal Correspondence, Chemicals in Plastics.
(Whereupon Exhibit 9 was marked for identification as of this date.)
Q. Take a look at this and it's dated July 11, 1969. Take a look at this, please. About halfway down, would you read that please where it says "All bags must bear"?
A. Yes.
Q. Please read that.
A. "All bags must bear the final precautionary labeling. Warning, breathing dust may be harmful. Do not breath dust. This warning statement should be printed on the

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front panel of the bag and the open space below the word 'asbestos' in letters at least three-quarters of an inch high. The caution statement 'Do not breathe dust' may be smaller and be both upper and lower case. This should be on every bag."
Q. Sir, do you see anything on there about mesothelioma?
A. No.
Q. About lung cancer?
A. No.
Q. About disabling asbestosis?
A. No.
Q. About asbestosis at all?
A. No, you just see a general warning here.
Q. Would you agree with me that workers in plants that Union Carbide supplied would be more likely to pay attention to that warning if it warned about mesothelioma?
A. As you put the question, I can't answer it, but I can answer something quite close to it because I think you need to ask the question what you expect a warning label to look like itself and what else would be

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supplied. So it can't be looked at in and of itself.
My interpretation as an analyst of organizational politics and realities is that if you put warning labels of the kind you just suggested, you would have very difficult time actually getting workers to carry these bags. And therefore, if your strategy was to control the consequences of asbestos, a warning of a modest sort here which is this combined with direct intelligence presented to the managers to work with the workers about why it was so important to keep the dust levels down.
If you did this, you used the word "cancer" in this, I think this is relevant. People were concerned at that time that there was a cancer scare and that it would throw both the good and the bad out together. So if there was no warnings of a serious kind and only this, then I think it would be fair to say that they were avoiding an alarmist advertisement of a fearfulness, but not supplying an alternative.
My answer hinges on the combination of what they said to the customers