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1 there.
 2 Q. So you would do about a hundred of these
 3 schools per year?
 4 A. That's a rough estimate, yes.
 5 Q. You had indicated that Kenworth was the first
 6 to adopt the ceramic lining. Are you aware of whether
 7 they purchased organic materials after that point in
 8 time in the late 70's?
 9 DEFENSE COUNSEL: Objection, form.
 10 A. Because of the way the clutch is specified,
 11 the OEM's had to produce whatever the end user would
 12 specify. And I would -- I can't say for sure once
 13 Kenworth made the change to ceramic whether they ever
 14 produced other product, but I would guess they did
 15 simply because of the customer base.
 16 Q. Do you have any documentation that would
 17 contain the date upon which Kenworth made the decision
 18 to go with the ceramics as their primary product?
 19 A. No, I don't.
 20 Q. And do you know the individual in Dana Corp.
 21 who would have the West Coast sales that would know
 22 that information?
 23 A. I would have to think about that a while only
 24 because I don't -- my memory doesn't remember names
 25 very well.

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1 Q. How did you -- what are you basing your
 2 statement on that Kenworth at some point in time made
 3 a decision to use ceramics as their primary
 4 transmission material?
 5 A. Well, when we -- when we started the Mack
 6 business on the East Coast with that super-duty clutch
 7 I talked about, that rapidly became a premium product
 8 and a standard of the industry. And Kenworth was
 9 always somewhat a leader in new products coming into
 10 the industry that were being accepted well by fleets.
 11 And Mack was using probably 70 percent ceramic with
 12 that clutch, and sometime not too long after that
 13 people started changing to it and I just recall that
 14 Kenworth was one of the ones that changed in the
 15 earlier part of that swing.
 16 Q. Now, Mack, even though they had the
 17 super-duty clutch, still used about 30 percent
 18 organics on their trucks?
 19 A. I would say they probably used about 20
 20 percent maybe. They used some standard ceramic, we
 21 call it, which was -- didn't have as many ceramic
 22 buttons on the disc as the super-duty did.
 23 Q. When -- you had indicated earlier that from
 24 those sales records that you reviewed there was a
 25 point in time where the sales were about 50 percent

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1 ceramics, 50 percent organics. Did there come a
 2 period in time prior to 1983 when that ratio changed?
 3 A. I think what I said was from the 70's -- the
 4 early 70's to 1980 the ceramic product grew from a
 5 very low percentage to around 50 percent of the
 6 business, around 1980.
 7 Q. Okay.
 8 A. Those were forecasted figures. I didn't see
 9 actual sales figures on them, but I feel they were
 10 pretty close.
 11 Q. And then the ceramics grew as the asbestos
 12 was removed. If you compared the ceramics to
 13 fiberglass, would it be true that the ceramics are
 14 more in use today than the fiberglass ones, discs?
 15 A. Yes. I think ceramics continued to grow, but
 16 at a slower pace from 1980 to the present.
 17 MR. SMITH-GEORGE: All right. That's all
 18 the questions I have. Thank you.
 19 MR. RADCLIFFE: Anybody else on the phone?
 20 MR. KATZ: I have one quick follow-up
 21 question. This is Mr. Katz.
 22 EXAMINATION OF THOMAS G. DICKSON
 23 BY MR. KATZ:
 24 Q. Can you testify whether Dana Corp. sold any
 25 brake products to Peterbilt or Kenworth?

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1 MR. RADCLIFFE: Object to the form.
 2 MR. SMITH-GEORGE: Object to form.
 3 A. I can't testify to that, no. I don't believe
 4 they did, but I can't -- I can't say for sure.
 5 Q. Okay. Who would have that information?
 6 Would the West Coast representative have that
 7 information?
 8 A. No. At that time -- at the time that we were
 9 selling heavy truck product -- axles to the industry,
 10 it was all being done out of the home offices. And
 11 basically the heavy truck product was the old
 12 International Harvester axle that Dana purchased, and
 13 most of it was sold to International Harvester. It
 14 would have been sales in the late 80's or 90's that it
 15 would even be possible for Kenworth to put one of the
 16 axles in, and I really doubt whether they ever
 17 engineered a Spicer axle into that vehicle prior to
 18 the late 90's, if they did at all.
 19 MR. KATZ: Okay. Thank you, Mr. Dickson.
 20 THE WITNESS: Uh-huh.
 21 MR. SMITH-GEORGE: Just for a point of
 22 clarification, was that question regarding brakes?
 23 MR. KATZ: Yes.
 24 MR. RADCLIFFE: That's what the question
 25 was.