December 12, 1980

MEMORANDUM FOR RECORD

RE: COMPARISON OF THE WESTERN ELECTRIC ASBESTOS GUIDELINES TO THOSE OF AT&T

The purpose of this memorandum is to provide a brief overview of Corporate Engineering's activities relating to occupational exposure to asbestos and to compare our Company guidelines to those recently released by AT&T.

From a general policy standpoint, the guidelines developed by AT&T and those of Western Electric are essentially similar. The principal difference is the medical surveillance criteria. While the AT&T guidelines specify an action level of .1 fiber/cc for the placement of employees in a medical surveillance program, Western Electric guideline's are more stringent and require that employees be placed in such a program if there is any measureable exposure (see attached medical protocol).

In general, the document developed by AT&T is a bit more comprehensive than the Western Electric instructions. In addition to the general guidelines, it contains copies of the OSHA Asbestos Standard, the EPA National Emission Standard for Asbestos, an executive overview, procedures for motor vehicle maintenance-brakes and clutches, procedures for compliance in Company owned and leased buildings with sprayed on asbestos and the BSP on respiratory protection. While the Western Electric guidelines do not contain these appendicies it should be noted that much of the information which is applicable to Western's operations has been provided to our Company locations under separate cover.

In terms of the guidelines, the Western Electric instructions (attached) were developed and distributed in 1978 and as can be seen a good deal of this information has been incorporated directly into the recently released AT&T guidelines. In addition to the information contained in the WE guidelines the AT&T guidelines go into considerable detail concerning:

(1) The history of the OSHA standard and other background data

(2) A section on Corporate responsibilities

(3) Details concerning monitoring (this is redundant since the NIOSH method is described in detail in Appendix 16.03)

(4) Employee information and training

In addition to the asbestos guidelines we have been actively involved in providing Company locations with information and guidance, both written and oral, concerning available substitutes for asbestos, encapsulation and removal activities, new analytical procedures, the elimination of unnecessary uses of asbestos, and respiratory protection practices.

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PLAINTIFF'S EXHIBIT

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