

ANSWER: See 1, 2 and 14.

18. Please describe and identify all tests and experiments conducted by you to determine whether or not asbestos fibers contained within your asbestos containing products would become air-borne upon their application or use by mechanics such as Plaintiff's decedent. Please state the dates of all tests and experiments and the results and conclusions of each test and/or experiment.

ANSWER: Ford objects to this Interrogatory on the grounds that it is overly broad, vague and impossible to answer fully in that it seeks information concerning all tests, all experiments and all results and conclusions of each such test and experiment.

Subject to the foregoing objection, Ford employes reviewed studies and articles from other sources. In the late 1960's, Ford had air sampling tests conducted to ascertain whether the then threshold limit value was being exceeded in brake lining operations. The limit was not being exceeded.

After a visit by Dr. Irving J. Selikoff, Ford conducted tests that sought to analyze asbestos emissions from brake linings. The findings were that less than .02% of the total brake lining wear generated during the braking process and released into the atmosphere was asbestos fibers. After comparing findings, with those who conducted similar tests, it was concluded that brake