

Nissan

- Need longer lead time:
 - Light-duty vehicle, front brakes -- at least 5 years
 - Light-duty vehicle, rear brakes -- at least 6 years
 - Light-duty trucks -- impossible to say
 - Clutch linings -- at least 6 years
- Rule should not apply to replacement parts.
- Rule should only apply to major vehicles redesigned (as new models are introduced).
- EPA should devise a flexible exemption procedure.

Chrysler

- Believe they can comply with time table of Alternative 2 except for trucks.
- Truck brakes will be asbestos-free at end of 10-year period specified in Alternative 2.
- EPA should publish guidelines for exemptions.
- Exempt aftermarket.
- Proposed schedule:

<u>Product Category</u>	<u>Time</u>
Construction products, clothing	2 years
Passenger car brakes; all transmission applications	7 years
All other cases in motor vehicles	12 years

- Modification of Alternative 2 represents most practical approach.

General Motors

- Brake testing process can require up to 5 years.
- Exempt aftermarket replacement for older vehicles.
- In 1979, GM made goal to eliminate asbestos from brakes by 1985.
 - Largely met on front disc brakes
 - Not met on rear drum brakes due to:
 - squeal
 - wear
 - friction stability
- 70 percent reduction is too severe after first year.