Page 25

of those subtopics did you and your professor -- is he a professor?
A. Not there, in fact, but teacher.
Q. Did you and your teacher discuss asbestos and how it bears on that issue?
A. No. Asbestos was not a particular topic of central importance at that point in my academic career. I was learning about methodologies for dealing with disputes about causation. That would be it.
Q. But you don't remember sitting down and talking to your teacher about the topic of asbestos?
A. Not then.
Q. I'm just focusing on then, Oxford College.
A. Right.
Q. Let's talk about your post-doctorate at Harvard?
A. That was in the School of Public Health.
Q. What did you learn about asbestos there?
A. Well, the purpose of that school of public health post-doctoral program was to

Page 26

acquaint me with a whole range of issues in public health, including occupational health, environmental disputes as well as medical care ones, ones about the delivery of medical care services.
So, we ranged over the course of the whole year in a weekly seminar on every topic you could imagine under those rubrics. It was my acquaintance with the world of public health organized as an occupation.
Q. So it is one-year endeavor?
A. A one-year endeavor, yes.
Q. During that one-year endeavor, you met once a week with a group?
A. Once a week in a seminar, but the rest of the time I was in a research group dealing with this, and we were located in the same building. So, there was much more than once a week communication about these matters.
Q. When was this?
A. 1965, '66.
Q. What did you learn about asbestos during your post-doc at Harvard University?
A. What I learned then was that, in connection with cancer, there was increased

Page 27

attention being paid to asbestos among other areas of causation that had just received a lot of prominence in the 1964, '65 period.
At that point, I also came into contact with earlier discussions about occupational injury and disease; that is, the earlier period at which Worker's Compensation came into being, and the whole history of efforts to make the workplace a safer place first for injury, and second for industrial diseases.
Q. If you can do this for me, if you can quantify out of your year post-doctorate at Harvard School of Public Health, can you tell me what percentage of time you spent on the topic of asbestos and its relationship to public health?
A. At that point, asbestos narrowly construed about 5 percent of the time. Asbestos as one of the occupational diseases that was prominent, that is, a discussion of these circumstances of which cancer arises, it was about 20 percent of the time.
Q. Define what you mean by narrowly construed.

Page 28

A. Well, we are only talking about the properties of asbestos rather than talking about the features of the disease that was related to asbestos and other things.
THE VIDEO OPERATOR: Going off the record the time is 9:57 a.m.
(Whereupon a discussion was held off the record.)
THE VIDEO OPERATOR: Returning to the record 9:59 a.m.
BY MR. GIANARIS:
Q. Professor, can you point to a book you read or a textbook you were assigned reading out of during your post-doctorate at Harvard regarding asbestos, that 5 percent, that narrow 5 percent where asbestos was the topic?
A. It's a long time ago.
Q. Yes, sir.
A. I don't think there was a book about asbestos regulation or the politics of asbestos, which is the part that I was mostly involved in. We used mostly case study articles rather than books.
So, since it was not a focal