used in the manufacture of brake linings are valuable, proprietary information that are disclosed only within GM on a need-to-know basis. These formulations are the result of decades of investment of time and money and their disclosure would put GM at a serious competitive disadvantage because domestic and foreign competitors could duplicate GM's products without having to undertake the lengthy and expensive laboratory and vehicle testing program that GM undertook. Competitors could also use this information to improve their products and processing methods without having to compensate GM for its efforts. For these reasons, GM objects to the disclosure of the specific details of its formulations.

(f) GM continues to manufacture drum brake linings containing chrysotile.

(g) Not applicable.

(h) Automotive drum brake lining segments consist of a solid, curved, dense, grayish material. Typical arc lengths range from 90° to 130° and are for drum diameters of 7, 8, 9-1/2, 11, 12 and 12-1/2 inches.

(i) Drum brake linings are one component of a vehicle braking system.

(j) Not applicable.

DISC BRAKE LININGS

(a) GM began to manufacture and sell disc brake linings in 1966.

(b) *See* response to (a). Outside suppliers of drum and disc brake linings were Johns-Manville, Abex Corporation, Eaton Brake Division, Dana Axle, American Coleman, Bendix, Dayton Walther, H.K. Porter, Kelsey Hayes, Kelsey Products Division, Rockwell International, Unibond Brake, Wagner Electric, Raybestos Manhattan, Friction Division Products, Ferodo, ITT AMCO, Multibestos, Universal Friction, Akebono, AMCO and Marshall Eclipse.

(c) Trade Names used by GM: AC Delco, Delco Moraine, GM Parts, Goodwrench.

(d) *See* responses to (a) and (c).

(e) GM disc brake linings have one or more grades of chrysotile asbestos, generally grades 5, 6 and 7, and the approximate percentage by weight ranged between 30% to 60%. The grade of chrysotile asbestos used in disc brake linings purchased by GM is unknown. The specific