basis of the data doing the same operations with brake materials that Mr. Mallia describes doing in this deposition?

A Well, you don't always know. Mallia does not discuss doing much of what some people believe is the primary source of exposure, which is arcing or grinding. That doesn't seem to be a predominant part of what he does.

He mentions sanding frequently which is frankly, pretty unusual. It's not something you read about people doing nor should they have had to do when doing new installations. So that's my view on that. If I was to guess based on what he said, his exposures probably would have been a little bit lower than the norm. Of course it's happening much later and you would expect exposures only to be going down in the era when he's doing the brake work.

Q Let's go through, Doctor, the types of things an individual working with brakes can do that can cause exposure to asbestos. Is there a potential for exposure to asbestos in opening the box?

A Well, we have to put a time frame maybe on your questions. Do you want to talk about it for his lifetime or in general?

Q I'd like to talk about it for the time period