Q Did he deal with public relations for the company?

A Probably partly.

Q In the 1940s?

A As far as I know.

BY MR. SMITH:

Q The fiberglass pipe insulation was the insulation that you were selling, correct?

A Right.

Q And during that period of time you sold that insulation primarily to people who actually worked for the Asbestos Workers union, correct?

A Well, our contractors or distributors, warehouses handled it and delivered it.

Q The people who used the product in the field, the fiberglass pipecovering, the people who used that product were primarily people who were members of the Asbestos Workers union, correct?

A As far as I know, yes.

Q And --

A Because they were applying insulation.