

Eaton
Axles & Brakes

Eaton Corporation
Axle & Brake Division
P.O. Box 4008
Kalamazoo, Michigan 49003
Telephone (616) 342-3000

December 22, 1983

Attention Docket Officer
Docket No. H-033C
Room S-6212
U.S. Department of Labor
Third Street and Constitution Avenue, NW
Washington, DC 20210

Dear Sir:

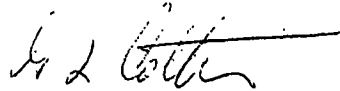
EATON

Eaton Corporation, Axle & Brake Division, understands the need for and supports the 1/2 asbestos fiber emergency temporary standard. This standard does not present any serious problems for our company. Our purpose for responding to this regulation is to urge OSHA not to impose more stringent regulations on asbestos without giving our industry sufficient time to develop and test new materials.

The trucking industry has been slowly moving away from asbestos friction materials as new materials are developed and tested. Up to now this has been a relatively slow process. We, as a supplier of foundation brakes to the truck industry, are stepping up our efforts to find non-asbestos friction materials which are safe and appropriate for this application. This can not be done over night. Even with the high priority it has today, it would take the truck components industry several years to do this properly.

If OSHA is considering an asbestos fiber regulation which would approach the 1/10 level, we urge it to be done on a reasonable time frame. While we are concerned about the safety of people who work with asbestos, we do not want to see OSHA do something which may potentially jeopardize safety on our nations highways.

Sincerely,



G.L. Cotter
General Manager

GLC/jd
(0657r)

Telex 22-4305

EAB 014358

SCF-EC-2550