

g) The date when first implemented.

ANSWER: See Response to Interrogatory No. 13(a) above.

h) Supply copies of reports of the research department, pertaining to the use by the corporation of asbestos in their manufactured products.

ANSWER: See Response to Interrogatory No. 13(a) above. Further, Abex objects to said Interrogatory for the reason that it seeks the production of documents through the use of interrogatories, which violates the Federal Rules of Civil Procedure.

14. Please state whether any of the distributors of your asbestos containing products were provided with any special instructions, oral or written, in regard to utilizing said products in a manner so as to avoid exposing workers to amounts of dust exceeding the MAC or TLV. If so, please state:

a) When these instructions were given.

ANSWER: Yes, 1978.

b) By whom these instructions were given.

ANSWER: By Friction Materials Standards Institute