

Health Foundation or Industrial Hygiene Foundation (IHF), National Insulation Manufacturers Assn. (NIMA), National Insulation Contractors Assn. (NICA), National Safety Council (NSC), American Ceramics Society (ACS), National Building Materials Distributors Assn. (NIA), Sprayed Mineral Fiber Manufacturers Assn. (SMFMA), Thermal Insulation Manufacturers Assn. (TIMA), Quebec Asbestos Mining Assn. (QAMA), to which you and/or any predecessor/related entity belonged or in which any or all of the same participated or were in any way affiliated with, since 1925, and state the applicable dates of such membership or participation.

ANSWER:

Ford, Ford employees, or both, have had memberships in the American Society for Testing and Materials, Society of Automotive Engineers and the American Industrial Hygiene Association. Ford cannot identify all of its employees who have been or are members of these organizations. Ford also had a membership from January 1947 through December 1974 in the Industrial Health Foundation, formerly known as the Industrial Hygiene Foundation

Ford is a member of the National Association of Manufacturers, 1176 F St., N W., Washington, D.C. 20006; Michigan Manufacturers Association; Auto Alliance, 300 New Center Building, Detroit, Michigan 48202; and the National Safety Council, 444 N. Michigan Ave., Chicago, Illinois 60611.

Representatives of the following organizations have confirmed no record of Ford membership: Institute of Occupational & Environmental Health, Quebec Asbestos Mining Association, Brake Lining Manufacturers Association, Friction Materials Standards Institute, Grinding Wheel Institute, Asbestos Tile Institute, Asbestos Information Association, Trudeau Foundation, Asbestos Brake Lining Manufacturers Institute.

Ford otherwise objects to this interrogatory because it is overly broad, unduly burdensome, and seeks information that is neither relevant nor reasonably calculated to lead to