

cated that replacement materials have not been qualified for use in tractor transmission clutches and axle brakes.

Friction product manufacturers gave mixed reports concerning the availability of asbestos-free materials for the various applications. Allied/ Bendix indicated that they had been successful in developing asbestos-free products for some applications, although many vehicle applications currently remain without qualified asbestos-free materials. Scan-Pac and DuPont both indicated that substitute materials are available for all applications, although Scan-Pac has concentrated on providing materials for aftermarket heavy vehicle applications. However, both Scan-Pac and DuPont lack the facilities to conduct vehicle or dynamometer tests required for FMVSS certification.

6.4 Concerns of Respondents to Feasibility of the Proposed Phase-Down Schedule

The comments of the respondents to this issue are summarized in Appendix D. The automobile industry, both domestic manufacturer and importers, voiced unanimous concern over the proposed timetable for asbestos phase-out. The following were major points made by this industry:

- (1) The years 1981, 1982, and 1983 were years of severe recession in the automobile industry. Therefore asbestos-usage quotas based on asbestos usage during these years are excessively restrictive.
- (2) The proposed rating is unfair to auto importers, who voluntarily restricted imports during 1981, 1982, and 1983.
- (3) Option 1, which allows a five-year lead time to develop and qualify new asbestos-free materials, is preferable than the proposed staggered phase-down effort.
- (4) If FMVSS 135 is adopted, more lead time may be required, depending upon exact provisions of FMVSS 135.

Truck and equipment manufacturers, whose products rely upon drum brake materials, were opposed to the proposed immediate reduction in allowable asbestos in friction materials. Navistar, Freightliner, and Wagner supported a plan in which most asbestos use was banned after a 5-year lead time. Modifications of this provision would allow the use of asbestos in