

England; Refractories Institute, the 1964 N.Y Academy of Sciences, Institute of Environmental Health.

Westinghouse objects to the incredible burden which would be imposed by reviewing its records to identify organizations to which its thousands of employees (past or present) may have belonged over the past years. There is no central repository of such information. Individual Westinghouse health and safety professional employees have undoubtedly belonged to various professional, trade, industrial and safety, hygiene or health organizations such as the American Industrial Hygiene Association, Health Physics Society, and the Society of Safety Engineers. Westinghouse's records would not include the dates individual memberships were commenced or terminated or who, if anyone, attended meetings.

Westinghouse cannot reasonably determine all of the trade and industry associations, groups and organizations of which it has been a member over the past twenty-five years. Nevertheless, without waiving these objections, Westinghouse can verify the following memberships.

- (a) National Electrical Manufacturers Association, 2101 L Street Northwest, Washington, D.C., is a trade organization for the electrical manufacturing industry, and includes companies that manufacture equipment used for the generation, transmission, distribution control and utilization of electrical power. Westinghouse has been a member of National Electrical Manufacturers Association since its inception in 1926. Before that, Westinghouse was a member of a predecessor organization since about 1915.**
- (b) The American Society for Testing and Materials ("ASTM"), 1016 Race Street, Philadelphia, PA. ASTM is an organization of engineers, scientists, professionals and others representing business firms, government agencies, educational institutions and laboratories. ASTM established voluntary consensus standards for various products, materials and services.**
- (c) Electronic Industries Association ("EIA"), Eye Street, N.W., Washington, D.C. EIA is an organization representing manufacturers of all types of electronic products which monitors and reports on regulatory and legislative events and provides informational services to its customers.**
- (d) American National Standards Institute ("ANSI"), 1430 Broadway, New York, New York. ANSI is a certification authority and clearing house for nationally coordinated voluntary safety, engineering and industrial standards.**
- (e) Charter member of the National Safety Council.**