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Question 4. There are a series of tests required to evaluate lining materials properly. These tests range from simple laboratory tests to elaborate dynamometer tests and long duration vehicle tests. Foundation brake manufacturers typically have worked with the lining suppliers to develop the total spectrum of brake and lining performance evaluations. It will take us a minimum of 3 months just to conduct certification testing over the entire range of brake hardware sold for a single new lining. While some of the other tests such as wear, water fade, noise, FAST or LST do not need to be run for every brake hardware configuration, the total time required will be considerably higher and dependant upon the resources and commitments from the lining suppliers.

Question 5. Eaton Axle & Brake Division is willing to go on record to challenge a more stringent standard in order to provide our industry ample time to convert to new materials. Whatever amount of time the industry as a whole requires to effectively accomplish this, we will support it.

We are continuing to seek additional information regarding this issue and would be more than happy to share our findings with you.

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