Doctor, can you tell me which of the studies that are considered and that go into the calculation of the average exposure have filing of the edges of brake pads occurring?

A I couldn't do that off the top of my head and I doubt that it's discussed very frequently directly in those studies. The filing of brakes during that time era would have been a decision of the mechanic on a case-by-case basis. And one has to infer that in the more than 200 samples that were collected we properly characterized the range of activities that are involved in brake work so that somehow at the end of the calculations, the end of the collection of all the data and the resulting calculations, we believe we've captured the various activities including the removal of the wheel, opening the box, any grinding, any sanding, any beveling that would have occurred.

You're aware that sanding and beveling should not have been a standard and customary practice in this time period between '78 and '85. It should not have been necessary.

Q In 1986 the EPA put out a pamphlet regarding exposure of mechanics to asbestos during brake repair; is that correct?

A Right.