

1 INTERROGATORY NO. 65:

2 At any time prior to 1972 were any tests or studies con-
3 ducted or sponsored by defendant to determine:

4 (a) The level of airborne dust or fiber concentration
5 incident to:

6 (i) Arching, sanding, clipping, grinding or bev-
7 eling defendant's asbestos-containing products;

8 (ii) Placing the products on/in motor vehicles and
9 other machinery requiring such products;

10 (iii) Tearing down the product during repair and
11 maintenance functions;

12 (b) Whether long-term (5 years or more) exposure to
13 products containing asbestos below 5 million particles per cubic
14 foot (mppcf) might cause asbestosis or expose the user of said
15 product to an increased statistical risk of developing:

16 (i) Bronchogenic cancer;

17 (ii) Mesothelioma (pleural or peritoneal);

18 (iii) Gastrointestinal cancer;

19 (iv) Asbestosis.

20 RESPONSE:

21 No.

22 INTERROGATORY NO. 66:

23 Was the concentration of the airborne asbestos fibers prior
24 to 1972 at job sites at which defendant's asbestos-containing
25 products were used within the prescribed threshold limit values?
26 If so, state the source of the information and the date said
27 information was obtained.

28 ///