linings posed no pollution hazard to the environment.

In 1973, Ford conducted a survey of asbestos-containing materials and exposures of Ford employees. These samplings showed that the OSHA time-weighted threshold limit value was not exceeded.

Ford acted as a consultant to a study undertaken by the Environmental Protection Agency and Bendix, which resulted in a published article in 1973. This study's findings were consistent with the findings from the previous Ford study.

In the 1970's, Ford participated in and provided partial funding for studies done by Dr. Irving Selikoff and others at the Mount Sinai School of Medicine in New York which included the publication of several papers, the first of which was Asbestos Exposure During Brake Lining Maintenance and Repair, appearing in "Environmental Research", Vol. 12, pages 110-128 (1976). The work done by Dr. Selikoff originally was a study of environmental pollution caused by the asbestos in brake linings. The study later focused on the occupation exposure of mechanics during brake repair and maintenance. Ford became advised of the studies undertaken by Mount Sinai.

19. State your knowledge as to the manner in which your asbestos containing brake lining products were removed or used by mechanics since 1940 and also state your knowledge as to the manner in which said mechanics using your brake lining products were exposed to or created dust in the form of asbestos air-borne fibers.