

Automobile Manufacturers

Automobile Importers of America

- Proposed ruling is unfair to importers
 - 1981-1983 baseline permit--import quotas were in effect and poor economic conditions prevailed
 - Very likely that domestic manufacturer will not be required to meet the 70%, phase-down in the first year
 - New entrants into U.S. market who have no baseline
 - European braking standards based on braking balance and skid avoidance rather than stopping distance as in U.S. European customers accept accelerated brake wear and noise.
- AIA proposes
 - Allow unlimited use of asbestos for a fixed period
 - Then impose ban for those uses where adequate substitute materials are available
 - Important to continue use of asbestos for replacement parts of previously manufactured vehicles

Subaru

- Support a 5 year lead time required before banning friction products.
- Include extension clause.
- Replacement parts for the car produced before effective model year must be excluded from this regulation.

Honda

- Set up timetable based on model year and must consider necessary lead time.
- Gaskets should be exempted because exposure of asbestos products is very unlikely.

Mitsubishi

- Lead-time too short.
- 5 years is more reasonable.
- Need exemption provision if acceptable replacements are not available after 5 years.
- If FMVSS-135 is adopted, more lead time will be required.
- Exemption past 5 years may be required for clutch facings and gaskets.