

16. Since 1939, have you ever directly participated as an officer or member of directors in a trade association which communicated with an agency or a department of the United States or any individual state, by any means, concerning the specifications, standard, any asbestos product or thermal insulation product. If your involvement was limited to attendance at general meetings, no answer is required. If so, state separately for each product or set of specifications:

- a. identify each such product;
- b. the number, if any, assigned to the military or federal specification or standard;
- c. the name of the association;
- d. the date, time, place, participants, and contents of each communication;
- e. whether any submissions, notes, minutes or memoranda in any form were recorded of such communication or of any meetings between you and the agency;
- f. if (e) is answered in the affirmative, state the name and location of the custodian of such records.

ANSWER TO INTERROGATORY NO. 16: To the best of Abex's knowledge, no answer is required.

17. Has your company had, as part of its processing, distribution and sales of asbestos materials and products, a system of inspections (quality control, safety, etc.) If the answer is in the affirmative, state:

- a. when the system was initiated;
- b. who was responsible for initiating and overseeing the system;
- c. describe the system used;
- d. if there are any documents describing the inspection system, identify each such document.

ANSWER TO INTERROGATORY NO. 17: Abex objects to this interrogatory on the grounds that it is overly broad, burdensome, lacks relevance to this case and is not reasonably calculated to lead to the discovery of admissible evidence.