transmit copies of the information that -- that was developing as we continued our work on it.

Q    Was the Zhang '97 article written with you, Tony Ye and Bill Butler together in the same room or did you all have separate contributions?

A    I would say that all of the numerical analyses that were done with respect to the rate ratios or the cancer -- the cancer death rates and the -- the dose-response relationship relating to distance from the facility versus cancer death rate, all of that numerical epidemiological data was -- was the responsibility of Bill Butler as a principal.

Q    What portion of the writing of the '97 Zhang article was your responsibility?

A    Well, the whole thing was really my responsibility in a sense because I wrote the task as to what the focus of our analysis or our concerns were going to be, and that centers around the set of questions that we initially forwarded to Dr. Zhang and then focuses in specifically on evaluating the data that most -- that is most relevant to and that clarifies what the cancer death rate information means with respect to
the actual exposed population at risk.
And so that -- that is actually a scope that Bill Butler and I had talked about and that he agreed with, and that is what we had consulted with Dr. Zhang about and that's what the focus of this article is.

Q    But my question was what portion of the writing of the '97 Zhang article was your responsibility?
MR. McLEOD: Well, the witness has already testified that it was done together with different people.
MR. PRAGLIN: Sure.
MR. McLEOD: I mean, are you talking about actual wordsmithing, consultation? I mean --
MR. PRAGLIN: Anyway you can explain it.
MR. McLEOD: -- they worked on it together.
BY MR. PRAGLIN:
Q    Any way you can explain it, Dr. Kerger.
A    I don't know how to assign percentages because there was hundreds of hours put in by Tony Ye. There were at least dozens of hours put in by both Dr. Butler and myself. And I'm sure there were hundreds and
hundreds of hours put in over time by Dr. Zhang; so I've never tried to compile or attribute a percentage of how much went in.

You can -- you can say that certainly the scope of the analysis, per se, was tailored to be specific to answering unanswered questions from the 1987 analysis and was focused, as I've just explained, on the population at risk and looking at dose-response