

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

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

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

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

15 A Well, the whole thing was really my
16 responsibility in a sense because I wrote the task as to
17 what the focus of our analysis or our concerns were
18 going to be, and that centers around the set of
19 questions that we initially forwarded to Dr. Zhang and
20 then focuses in specifically on evaluating the data that
21 most -- that is most relevant to and that clarifies what
22 the cancer death rate information means with respect to

23 the actual exposed population at risk.

24 And so that -- that is actually a scope that
25 Bill Butler and I had talked about and that he agreed

161

1 with, and that is what we had consulted with Dr. Zhang
2 about and that's what the focus of this article is.

3 Q But my question was what portion of the writing
4 of the '97 Zhang article was your responsibility?

5 MR. MCLEOD: Well, the witness has already testified
6 that it was done together with different people.

7 MR. PRAGLIN: Sure.

8 MR. MCLEOD: I mean, are you talking about actual
9 wordsmithing, consultation? I mean --

10 MR. PRAGLIN: Anyway you can explain it.

11 MR. MCLEOD: -- they worked on it together.

12 BY MR. PRAGLIN:

13 Q Any way you can explain it, Dr. Kerger.

14 A I don't know how to assign percentages because
15 there was hundreds of hours put in by Tony Ye. There
16 were at least dozens of hours put in by both Dr. Butler
17 and myself. And I'm sure there were hundreds and

18 hundreds of hours put in over time by Dr. Zhang; so I've
19 never tried to compile or attribute a percentage of how
20 much went in.

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