

DEC -2 2004

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CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Paul Fabien
Ford Motor Company
Suite 1400
Parklane Towers West
Three Parklane Blvd.
Dearborn, MI 48126

Re: Confidentiality Determination/Request for Reconsideration (EA02-027)

Dear Mr. Fabien:

This letter responds to a request for reconsideration from James P. Vondale, dated August 11, 2004, of the agency's January 6, 2004 decision to deny confidential treatment for certain information provided in response to an information request (IR) issued by the Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) on December 12, 2002. Earlier this year, NHTSA provided Ford a substantial extension of time to submit the request for reconsideration, including new justifications of its claim for confidentiality.

In a letter dated August 4, 2003, Ford requested confidential treatment for information submitted to ODI in response to an IR issued as part of Engineering Analysis (EA)02-027. Ford's request for confidentiality covered that portion of its response submitted on March 10, 2003, which responded to IR Questions 1, 8, and 11. The submission consisted of a total of 66 boxes of documents.

In its initial request for confidentiality, Ford broadly requested confidential treatment for its submission. Ford characterized the information as consisting of: shared supplier information subject to a confidentiality agreement, testing data that revealed Ford specifications, requirements, or engineering analysis, future model year data, analytical warranty data, cost data, failure mode information, and engine calibration information. Ford asserted that disclosure of the information would be likely to cause it to suffer substantial competitive harm.

By letter dated January 6, 2004, Mr. Otto Matheke denied Ford's request. In his denial letter, Mr. Matheke applied the substantial competitive harm standard set forth in *National Parks & Conservation Ass'n v. Morton*, 498 F.2d 765 (D.C. Cir. 1974). As part of his analysis, Mr. Matheke pointed to the deficiencies contained in Ford's request for confidentiality, which, among

other things, included the pervasive lack of an adequate explanation showing why the information should be viewed as confidential, what the harmful effects of disclosure would be, and why those effects should be viewed as substantial.

Ford's Reconsideration Request

In its reconsideration letter, Ford states that it no longer seeks confidential treatment for the contents of Box No. 6 but continues to seek confidential treatment for the remaining information in Boxes 1-5 and 7-66.

Ford's request for reconsideration states that it provides more detailed support for Ford's claim of confidentiality. Ford describes Boxes 63-65 as containing information that, if disclosed, would cause it to suffer substantial competitive harm. In support, for these boxes, Ford's letter includes a 26-page index that provides a series of Bates numbers along with letter codes that correspond to descriptions proffered by Ford to justify withholding particular documents. Ford's letter provides a key to these codes that describes the type of information contained within a particular Bates page range.

For the first time, Ford asks the agency to treat the contents of the remaining boxes -- Boxes 1-5, 7-62, and 66 -- as voluntarily submitted. In support, Ford states that the documents in these boxes fall outside the population of documents that Ford now interprets as being covered by ODI's IR -- i.e., documents resulting from certain Ford processes such as the Critical Concern Review Group and Field Review Committee, as well as final field reports. Ford also asserts that certain information falls outside of the scope of ODI's IR because it pertains to vehicle components that were not included in the IR's definition of "Subject Components."

Ford also contends that the documents in Boxes 1-5, 7-62, and 66 contain commercial or financial information that is exempt from disclosure under FOIA Exemption 4, 49 U.S.C. § 30167 and 49 CFR 512.15 and that some documents, without identifying them in its letter, contain Ford or supplier trade secrets. Ford also claims that the disclosure of its submission would impair the government's ability to collect information in the future.

Ford supplemented its request in a letter dated November 8, 2004 by supplying a certification from Visteon and a copy of that supplier's documents that Ford contends were provided in its submission. Ford contends that the Visteon documents contain internal process information used by Ford and its suppliers to examine and resolve field issues, assessments and evaluations of products and processes conducted by Ford or its suppliers, and information related to warranty data analysis. The documents total fourteen (14) pages. Ford did not identify the location of these 14 pages in the 66 boxes of documents.

I have decided to deny most of Ford's request for reconsideration, and to grant it in part.

Background

Over a considerable period of time, Ford assessed problems in MY 2001 – 2003 Ford Escapes with the 3.0L engine and its rebadged twin the Mazda Tribute, involving intermittent engine quit or idle dip. Ford and Mazda issued numerous service bulletins and warranty documents relating to the problems with stalling. Ford also modified the design of engine and other components to address this problem.

Among the systems addressed were the evaporative vapor management system including its valve, vent line in the evaporative emissions system, idle air control (IAC) valve, powertrain control module (PCM), electronic engine control (EEC) relay, Differential Pressure Feedback EGR (DPFE) sensor, mass air flow (MAF) sensor gasket, PCM harness, and key chain weight. Suffice it to say, Ford considered many matters in addressing the stalling problem.

Voluntary Submission

Information submitted voluntarily to the government may be accorded confidential treatment under Exemption 4 of the Freedom of Information Act (FOIA), 5 U.S.C. § 552(b)(4), if the submitter does not customarily disclose the information. See *Critical Mass Energy Project v. NRC*, 975 F.2d 871 (D.C. Cir. 1992) and *Center for Auto Safety v. NHTSA*, 244 F.3d 144 (D.C. Cir. 2001).

To determine whether a response is voluntary, one must consider the authority under which the information was requested, if any, and the language of the request based on an objective standard. In this case, ODI's IR was issued under 49 U.S.C. § 30166, which authorizes NHTSA to require manufacturers to submit reports. Thus, Ford's response was not voluntary if the documents were within the scope of the information request.

Ford bases its assertion that the documents in Boxes 1-5, 7-62, and 66 were submitted voluntarily on its interpretation of ODI's request. Questions 1, 8, and 11 of ODI's December 12, 2002 IR, in response to which Ford produced the documents (including those which it asserts for the first time it submitted voluntarily), required Ford to provide the following information and documents:

- Production and related information by model and model year regarding the subject vehicles (i.e. 2001-2002 Ford Escape);
- A description of all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively, "actions") that relate to, or may relate to, the alleged defect in the subject vehicles that have been conducted, are being conducted, are planned, or are being planned by, or for,

Ford. In addition, the request asked for all documents related to the actions, regardless of whether the documents are in interim, draft, or final form; and

- Ford's assessment of the alleged defect in the subject vehicle, subdivided by cause, failure mechanism and other inquiries.

ODI's IR was broad. In addition to addressing a broad range of "actions," ODI instructed Ford to provide documents that relate or may relate to those actions. The term "related" is broad and given its ordinary meaning. *Morales v. Trans World Airlines*, 504 U.S. 374 (1992). Thus, the IR's scope included documents considered in the course of those actions as well as Ford's assessments. As discussed above, Ford considered many vehicle systems and parts in addressing the stalling problems.

Ford attempts to narrow the language of the IR, and thus argue that Ford's response was voluntary, by asserting that "the documents included in these boxes [1-5, 7-62 and 66] . . . are not interpreted by Ford as being encompassed within the scope of the underlying request. Ford has developed specific, recognized processes for identifying, investigating, and assessing potential safety concerns in our products. Ford interprets the agency's request as seeking the documents resulting from such processes or actions, such as documents from Ford's Critical Concern Review Group (CCRG) and Field Review Committee (FRC), if any, and final field service action evaluation papers (14 D's and 8 D's)." We do not accept Ford's proffered interpretation. ODI's IR addressed "all" actions and was not limited to Ford's processes such as those addressed by its CCRG, FRC, and field report documents.

Ford further contends that certain information may pertain to items outside of the "Subject Component" definition. The three questions in the IR -- Numbers 1, 8 and 11 -- are not based on the subject component. Other questions in the IR are component-based. Compare Numbers 8 and 11 to Number 9 in the IR. In any event, Ford does not identify with any particularity which documents fall outside of the scope of the IR on the basis of its proffered interpretation.

Accordingly, the agency does not accept Ford's arguments that NHTSA should accord confidential treatment to the contents of Boxes 1-5, 7-62, and 66 on the grounds that Ford submitted the documents voluntarily.

Substantial Competitive Harm and Trade Secrets

Boxes 63-65

Ford claims that the disclosure of Boxes 63-65 would be likely to cause substantial competitive harm under FOIA Exemption 4. Ford submitted a 26-page index and a series of descriptions to support its claim. The index does not support Ford's entire claim; instead, the index is both over inclusive and under inclusive because there is a mismatch between the documents contained in the boxes and the index. For example, a substantial number of documents that appear in Boxes 63-65 could not be located in the index. As a result, there is

inadequate support for treating these documents as confidential since Ford did not account for them in its justification letter. Similarly, the index includes page numbers of documents that do not correspond to documents contained in these boxes. There is inadequate justification for these documents as well.

We are granting Ford's request for confidentiality of documents in Boxes 63-65 that are properly listed in the index, based on our review. We are denying Ford's request for the remainder. The documents for which confidentiality is granted are identified on our mark-up of the index, which is enclosed.

Boxes 1-5, 7-62, and 66

Ford asserts that the documents in Boxes 1-5, 7-62, and 66 contain commercial or financial information that is exempt from disclosure under FOIA Exemption 4, 49 U.S.C. § 30167 and 49 CFR 512.15. As noted above, Mr. Matheke's letter advised Ford that it needed to provide an adequate justification for its request for confidentiality. In contrast to its approach of providing document-specific justification for Boxes 63-65, Ford has not provided any specific justifications for the very large volume of documents in Boxes 1-5, 7-62, and 66. Ford's conclusory blanket contention that release of these documents likely would result in substantial competitive harm is not an adequate justification. Consequently, Ford's request is denied.

Ford also claims that documents in Boxes 1-5, 7-62, and 66 contain trade secrets. Ford's letter does not identify this information with any specificity or provide an explanation as to why it satisfies Exemption 4. Accordingly, I am rejecting this claim.

Visteon documents

As to the fourteen (14) pages of Visteon documents submitted by Ford with its November 8, 2004 letter, certain portions of the submission, if released, likely would cause substantial competitive harm -- namely, those portions that describe Ford's interim containment actions in the production process and root cause analysis. However, Ford has not sufficiently demonstrated that the disclosure of individual team member identities (Bates numbers EA02-027 25508, EA02-027 25514, EA02-027-D 12245, and EA02-027-D 12251), passages describing the investigated problem in very general terms (EA02-027 25509 and EA02-027-D 12246), and materials identifying service messages sent to Ford dealerships (along with the accompanying descriptions of those messages) (EA02-027 25509 and EA02-027-D 12246) would be likely to cause competitive harm. Ford has also not explained why that harm, if any, should be viewed as substantial. Also, the service messages appear to be public, as they are communications that Ford would have been required to submit to the agency pursuant to agency regulations. See 49 CFR 573.8 (2001) (recodified at 49 CFR 579.5 (2002)).

Even as to those Visteon documents that likely would cause substantial competitive harm, Ford has not identified where, if at all, the documents are located in the 65 boxes of documents. The documents in the boxes are not organized. The agency does not know whether these documents were in fact submitted by Ford and will not sort through 65 boxes to try to

locate them, if they are there. The agency is providing Ford with the opportunity to examine the contents of these boxes to determine the location of these Visteon documents. Ford will have 20 working days from the receipt of this letter to make arrangements to complete its search of the submitted boxes and to identify these documents. Should Ford opt to conduct this search, which will be conducted on NHTSA's premises, it will be conducted under agency supervision.

Impairment to the Government

Ford also asserts that the disclosure of its submission would impair future government information collection efforts. Ford provides no explanation as to which documents or what type of information would not be produced in the future or how the government's efforts would be impaired should disclosure occur. In short, Ford has not supported its assertion. In addition, as is evident, Ford faced major problems with stalling in the Escape and Tribute. It is implausible that Ford would not assess these problems and generate documents in doing so. I find that there is no basis for Ford's claims of impairment to the agency's ability to collect similar information in the future.

Conclusion

In sum, I have determined that the contents of Boxes 63-65 as described above and identified in the enclosed mark-up of Ford's index will be withheld under Exemption 4. The remainder will be disclosed.

Notwithstanding this partial grant of confidential treatment, the information may be disclosed under the various provisions set forth in 49 U.S.C. § 30167 and 49 CFR Part 512. You will be notified prior to any such release of information.

My decision is administratively final and no further administrative reconsideration or appeal is available. Documents other than those identified as confidential on the enclosed mark-up of Ford's index for boxes 63-65 are subject to public disclosure within twenty (20) working days after receipt of this letter.

Sincerely,



Jacqueline Glassman
Chief Counsel

Enclosures: 1 (Mark-up of Ford's 26-page index)

NHTSA:NCC-113:Kido:pll:11/18/04: NCC04-005552, 008586
NCC-113:Subj/Chron
CC:NVS-212 A. Motamedamin.
U:\NCC30\CONF\recon\Ford04-005252, 04-008586.mk.doc

EA02-027

Attachment to August 11, 2004 Petition for Reconsideration
- List of Documents Contained in Boxes 63, 64, and 65 -

Box Label Range	Type of Confidential Information
EA02-027 D 1933-1935	B, D, F
EA02-027 14938-14940	B, D, F
EA02-027 14967-14969	B, D, F
EA02-027 A 3278-3280	B, D, F
EA02-027 20596-20598	B, D, F
EA02-027 C 0707-0709	B, D, F
EA02-027 A 16294-16296	B, D, F
EA02-027 13331-13333	B, D, F
EA02-027 C 2446-2448	B, D, F
EA02-027 B 8291-8293	B, D, F
EA02-027 G 21480-21482	B, D, F
EA02-027 C 1012-1014	B, D, F
EA02-027 B 7991-7993	B, D, F
EA02-027 B 8396-8398	B, D, F
EA02-027 A 11712-11715	B, D, F
EA02-027 A 11612-11614	B, D, F
EA02-027 D 1938-1940	B, G
EA02-027 14961-14963	B, G
EA02-027 D 8097-8099	B, G
EA02-027 A 3365-3367	B, G
EA02-027 20449-20451	B, G
EA02-027 3463-3465	B, G
EA02-027 C 0713-0715	B, G
EA02-027 A 16335-16337	B, G
EA02-027 13326-13328	B, G
EA02-027 C 2441-2443	B, G
EA02-027 11780-11782	B, G
EA02-027 B 8296-8298	B, G
EA02-027 G 21475-21477	B, G
EA02-027 B 8461-8463	B, G
EA02-027 B 7989-7990	B, G
EA02-027 C 1015-1016	B, G
EA02-027 A 12130-12131	B, G

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EA02-027

Attachment to August 11, 2004 Petition for Reconsideration

- List of Documents Contained in Boxes 63, 64, and 65 -

	Bates Label Range	Type of Confidential Information
EA02-027	A 11123-11124	B, G
EA02-027	C 11321-11324	B, G
EA02-027	D 1941-1944	B, G
EA02-027	B 11756-11758	B
EA02-027	D 8108-8110	B
EA02-027	D 1945-1947	B
EA02-027	A 3360-3362	B
EA02-027	3458-3460	B
EA02-027	C 0710-0712	B
EA02-027	11775-11777	B
EA02-027	B 8301-8303	B
EA02-027	B 8997-8999	B
EA02-027	13321-13323	B
EA02-027	C 2487-2489	B
EA02-027	G 21470-21472	B
EA02-027	B 8457-8458	B
EA02-027	A 11120-11122	B
EA02-027	A 12128-12129	B
EA02-027	A 12126-12127	B
EA02-027	A 11151-11153	B
EA02-027	A 11154-11158	B
EA02-027	A 11159-11161	B
EA02-027	G 21461-21463	B
EA02-027	G 21464-21466	B
EA02-027	B 7987-7988	B
EA02-027	B 8307-8309	B
EA02-027	C 2492-2494	B
EA02-027	13359-13361	B
EA02-027	C 2248-2250	B
EA02-027	C 0704-0706	B
EA02-027	A 12126-12127	B
EA02-027	A 11151-11153	B
EA02-027	A 11154-11158	B

CONFIDENTIALITY
DENIED
MISSING

EA02-027

Attachment to August 11, 2004 Petition for Reconsideration

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Bates Label Range	Type of Confidential Information
EA02-027 A 11159-11161	B
EA02-027 G 21461-21463	B
EA02-027 G 21464-21466	B
EA02-027 B 7987-7988	B
EA02-027 B 8307-8309	B
EA02-027 C 2492-2494	B
EA02-027 13359-13361	B
EA02-027 C 2248-2250	B
EA02-027 C 0704-0706	B
EA02-027 G 41710-41712	B
EA02-027 G 5082-5083	B
EA02-027 A 3498-3501	B
EA02-027 A 3355-3357	B
EA02-027 D 1955-1958	B
EA02-027 D 1953-1954	B
EA02-027 A 11117-11119	B
EA02-027 11768-11770	B
EA02-027 14393-14395	B
EA02-027 B 8453-8454	B
EA02-027 3453-3455	B
EA02-027 D 2512-2514	B
EA02-027 A 4007-4008	B
EA02-027 11765-11767	B
EA02-027 A 12124-12125	B
EA02-027 A 11111-11113	B, D
EA02-027 G 21453-21455	B, D
EA02-027 B 8321-8323	B, D
EA02-027 13351-13353	B, D
EA02-027 C 2240-2242	B, D
EA02-027 C 0701-0703	B, D
EA02-027 15438-15440	B, D
EA02-027 D 1968-1970	B, D
EA02-027 D 2385-2387	B, D

CONFIDENTIALITY
DENIED
- MISSING -

EA02-027

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	Bates Label Range	Type of Confidential Information
EA02-027	C 0594-0596	B, D
EA02-027	A 10906-10909	B, D
EA02-027	A 10910-10912	B, D
EA02-027	A 3398-3400	B, D
EA02-027	A 4010-4012	B, D
EA02-027	B 8447-8448	B, D
EA02-027	D 5933-5934	B
EA02-027	D 8180-8183	B, C, F, G
EA02-027	C 0697-0700	B, C
EA02-027	C 1053-1054	B, C
EA02-027	13346-13348	B, C
EA02-027	A 11109-11110	B, C
EA02-027	21595-21596	B, C
EA02-027	A 12122-12123	B, C
EA02-027	A 11381-11383	B, C
EA02-027	D 1973-1975	B, C
EA02-027	D 1973	B
EA02-027	15435-15437	B, C, G
EA02-027	D 2403-2405	B, C, G
EA02-027	B 8442-8444	B, C, G
EA02-027	C 2235-2237	B, C, G
EA02-027	G 21448-21450	B, C, G
EA02-027	B 8326-8328	B, C, G
EA02-027	B 7985-7986	B, C, G
EA02-027	C 2498-2500	B, C, G
EA02-027	A 3350-3352	B, C, G
EA02-027	A 4013-4015	B, C, G
EA02-027	B 10238-10239	B, D
EA02-027	B 10010-10011	B, D
EA02-027	B 7977-7978	B, D
EA02-027	D 2519-2521	B, D
EA02-027	A 3974-3975	B, D
EA02-027	C 1029-1030	B, D

EA02-027

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Bates Label Range	Type of Confidential Information
EA02-027 D 2515-2516	B, D
EA02-027 B 10237	B, D
EA02-027 D 2229-2230	B, D
EA02-027 D 2231-2233	B, D
EA02-027 A 3416-3417	B, D
EA02-027 11755-11756	B, D
EA02-027 G 2546-2547	B, D
EA02-027 20731-20732	B, D
EA02-027 B 8485-8486	B, D
EA02-027 13438-13439	B, D
EA02-027 14391-14392	B, D
EA02-027 A 11615-11618	B, D
EA02-027 B 8167	B
EA02-027 C 12494	B
EA02-027 D 2079-2080	B
EA02-027 B 10003	B
EA02-027 D 2081-2083	B
EA02-027 D 2084-2086	B
EA02-027 D 2087-2089	B
EA02-027 D 2090-2092	B
EA02-027 D 2093-2094	B
EA02-027 D 2095-2096	B
EA02-027 D 2097-2098	B
EA02-027 D 2099-2101	B
EA02-027 D 2102-2104	B
EA02-027 D 2105-2107	B
EA02-027 D 2108-2112	B
EA02-027 D 2113-2116	B
EA02-027 D 2117-2120	B
EA02-027 D 2121-2124	B
EA02-027 D 2125-2133	B
EA02-027 D 2134-2143	B
EA02-027 D 2144-2155	B

EA02-027

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Bates Label Range			Type of Confidential Information
EA02-027	D	2156-2165	B
EA02-027	D	2169-2181	B
EA02-027	D	2182-2194	B
EA02-027	D	2195-2209	B
EA02-027	D	2210-2225	B
EA02-027	C	12473-12486	B
EA02-027	B	9082-9083	B
EA02-027		11763-11764	B
EA02-027	C	1099-1100	B
EA02-027	C	0746-0747	B
EA02-027	D	2482-2497	B
EA02-027	D	2453-2466	B
EA02-027	D	2467-2481	B
EA02-027	D	2437-2449	B
EA02-027	D	2424-2436	B
EA02-027	D	2407-2408	B
EA02-027	G	2335-2336	B
EA02-027	G	2337-2339	B
EA02-027	G	2340	B
EA02-027	A	11103-11104	B
EA02-027		11757-11759	B
EA02-027	C	0743-0745	B
EA02-027	G	2551-2552	B
EA02-027	D	2450-2452	B
EA02-027	D	2418-2420	B
EA02-027	D	2421-2423	B
EA02-027	D	2166-2168	B
EA02-027	B	7979-7980	B
EA02-027	A	1103-1104	B
EA02-027		11757-11759	B
EA02-027	C	0743-0745	B
EA02-027	G	2551-2552	B
EA02-027	D	2450-2452	B

EA02-027.

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	Bates Label Range		Type of Confidential Information
EA02-027	D	2418-2420	B
EA02-027	D	2422-2423	B
EA02-027	D	2166-2168	B
EA02-027	B	7979-7980	B
EA02-027	B	8356-8357	B
EA02-027		13433-13435	B
EA02-027		14389-14390	B
EA02-027	B	8437-8438	B
EA02-027	B	10007-10009	B
EA02-027	A	3387-3388	B
EA02-027	A	4016-4018	B
EA02-027		20084-20086	B
EA02-027		20100-20102	B
EA02-027		20094-20095	B
EA02-027		19998-20000	B
EA02-027		20108-20109	B
EA02-027		20019-20020	B
EA02-027	D	2285-2286	B, D
EA02-027	D	2577-2578	B, D
EA02-027	G	2530-2531	B, D
EA02-027	D	2579-2580	B, D
EA02-027	B	8372-8373	B, D
EA02-027	B	10015-10016	B, D
EA02-027	B	7971-7972	B, D
EA02-027		11695-11696	B, D
EA02-027	G	2333-2334	B, D
EA02-027	B	7969-7970	B, D
EA02-027	D	2287-2293	B, D
EA02-027	D	2581-2588	B, D
EA02-027	B	10024-10026	B, D
EA02-027		20858-20867	B, D
EA02-027	G	12408-12410	B, D
EA02-027	A	3979-3981	B, D

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Bates Label Range		Type of Confidential Information
EA02-027	13368-13370	B, D
EA02-027	14383-14385	B, D
EA02-027	A 3976-3978	B, D
EA02-027	C 0740-0742	B, D
EA02-027	11736-11738	B, D
EA02-027	B 8386-8388	B, D
EA02-027	D 2314-2317	B, D
EA02-027	D 2310-2313	B, D
EA02-027	D 2593-2596	B, D
EA02-027	D 2325-2328	B, D
EA02-027	D 2321-2324	B, D
EA02-027	D 2599-2602	B, D
EA02-027	A 4003-4006	B, D
EA02-027	G 12403-12404	B, D
EA02-027	C 1031-1033	B, D
EA02-027	G 12405-12406	B, D
EA02-027	20854-20857	B, D
EA02-027	13364-13367	B, D
EA02-027	B 8335-8338	B, D
EA02-027	B 10017-10020	B, D
EA02-027	13133-13136	B, D
EA02-027	13129-13132	B, D
EA02-027	13125-13128	B, D
EA02-027	13121-13124	B, D
EA02-027	D 2298-2304	B, D
EA02-027	A 3998-4002	B, D
EA02-027	G 12070-12074	B, D
EA02-027	13375-13379	B, D
EA02-027	A 3993-3997	B, D
EA02-027	D 2305-2309	B, D
EA02-027	G 12065-12069	B, D
EA02-027	13380-13384	B, D
EA02-027	A 3413-3415	B, D

EA02-027

Attachment to August 11, 2004 Petition for Reconsideration
- List of Documents Contained in Boxes 63, 64, and 65 -

Bates Label Range	Type of Confidential Information
EA02-027 B 9040-9042	B, D
EA02-027 14379-14382	B, D
EA02-027 D 2246-2248	B
EA02-027 B 10021-10023	B
EA02-027 11749-11751	B
EA02-027 G 24273-24275	B
EA02-027 G 2541-2543	B
EA02-027 A 3968-3970	B
EA02-027 D 2539-2541	B
EA02-027 D 2536-2538	B
EA02-027 B 8364-8365	B
EA02-027 B 7975-7976	B
EA02-027 20091-20093	B
EA02-027 20105-20107	B
EA02-027 20103-20104	B
EA02-027 20075-20077	B
EA02-027 20072-20074	B
EA02-027 20003-20005	B
EA02-027 20069-20071	B
EA02-027 11733-11734	B
EA02-027 B 8376-8377	B
EA02-027 B 7967-7968	B
EA02-027 C 2220-2221	B, D
EA02-027 D 2628-2629	B, D
EA02-027 D 2609-2610	B, D
EA02-027 D 2607-2608	B, D
EA02-027 G 2525-2526	B, D
EA02-027 D 2355-2356	B, D
EA02-027 D 2343-2344	B, D
EA02-027 G 24271-24272	B, D
EA02-027 20715-20716	B, D
EA02-027 13450-13451	B, D
EA02-027 A 12132-12133	B

CONFIDENTIALITY
DENIED
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EA02-027

Attachment to August 11, 2004 Petition for Reconsideration
- List of Documents Contained in Boxes 63, 64, and 65 -

	Dates Label Range		Type of Confidential Information
EA02-027	G	21485-21487	B
EA02-027	B	7994-7996	B, D
EA02-027	B	7997-7998	B
EA02-027	B	8286-8288	B
EA02-027	B	8345-8347	B, D
EA02-027		11447-11450	B, D
EA02-027		11451-11454	B, D
EA02-027		11455-11458	B, D
EA02-027		11459-11462	B, D
EA02-027		11463-11466	B, D
EA02-027		11467-11470	B, D
EA02-027		11471-11474	B, D
EA02-027		11475-11478	B, D
EA02-027		11479-11482	B, D
EA02-027		11483-11486	B, D
EA02-027		11487-11490	B, D
EA02-027		11491-11494	B, D
EA02-027		11495-11498	B, D
EA02-027		117901-1792	B, D
EA02-027		11443-11446	B, D
EA02-027		11499-11502	B, D
EA02-027		11503-11506	B, D
EA02-027		11507-11510	B, D
EA02-027		11511-11514	B, D
EA02-027		11515-11518	B, D
EA02-027		11523-11526	B, D
EA02-027		11535-11538	B, D
EA02-027		11527-11530	B, D
EA02-027		11531-11534	B, D
EA02-027		11519-11522	B, D
EA02-027		11539-11542	B, D
EA02-027	A	11125-11126	B
EA02-027		11543-11546	B, D

CONFIDENTIALITY
DENIED
- MISSING -

EA02-027

Attachment to August 11, 2004 Petition for Reconsideration
- List of Documents Contained in Boxes 63, 64, and 65 -

Bates Label Range		Type of Confidential Information
EA02-027	11547-11550	B, D
EA02-027	C 2510-2513	B, D
EA02-027	C 2333-2336	B, D
EA02-027	C 2449-2451	B
EA02-027	14403-14407	B
EA02-027	B 8260-8262	B, D
EA02-027	C 0630-0632	B, D
EA02-027	C 0540-0000	B, D
EA02-027	C 0537-0539	B, D
EA02-027	A 12145-12147	B, D
EA02-027	G 21536-21538	B, D
EA02-027	11837-11839	B, D
EA02-027	C 2299-2301	B, D
EA02-027	13277-13279	B, D
EA02-027	14434-14436	B, D
EA02-027	D 12402-12404	B, D
EA02-027	C 6435-6437	B, D
EA02-027	B 11166-11168	B, D
EA02-027	D 8563-8565	B, D
EA02-027	G 27939-27941	B, D
EA02-027	A 3334-3336	B, D
EA02-027	B 8032-8034	B, D
EA02-027	C 11556-11563	B, D
EA02-027	C 11419-11422	B, D
EA02-027	D 8573-8578	B, D
EA02-027	C 11573-11579	B, D
EA02-027	C 11505-11508	B, D
EA02-027	A 3274-3277	B, D
EA02-027	20655-20658	B, D
EA02-027	B 10980-10983	B, D
EA02-027	B 10959-10962	B, D
EA02-027	B 10904-10907	B, D
EA02-027	B 10984-10988	B, D

CONFIDENTIALITY
DENIED
- MISSING -

EA02-027

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	Bates Label Range	Type of Confidential Information
EA02-027	B 10989-10993	B, D
EA02-027	C 6852-6855	B, D
EA02-027	C 6453-6456	B, D
EA02-027	C 0550-0555	B, D
EA02-027	C 0556-0559	B, D
EA02-027	C 0560-0564	B, D
EA02-027	C 0541-0547	B, D
EA02-027	A 12142-12144	B, D
EA02-027	C 0626-0629	B, D
EA02-027	14424-14426	B, D
EA02-027	13283-13286	B, D
EA02-027	13287-13290	B, D
EA02-027	C 2338-2342	B, D
EA02-027	C 2483-2486	B, D
EA02-027	B 8001-8003	B, D
EA02-027	B 8979-8982	B, D
EA02-027	G 21527-21530	B, D
EA02-027	3144-3147	B, D
EA02-027	20650-20652	B, D
EA02-027	D 12255-12258	B, D
EA02-027	C 12479-12482	B, D
EA02-027	3181-3183	B, D
EA02-027	A 3325-3327	B, D
EA02-027	G 21520-21522	B, D
EA02-027	B 8270-8272	B, D
EA02-027	11825-11827	B, D
EA02-027	C 2475-2477	B, D
EA02-027	13313-13315	B, D
EA02-027	14416-14419	B, D
EA02-027	C 0734-0736	B, D
EA02-027	A 16145-16147	B, D
EA02-027	A 12140-12141	B, D
EA02-027	A 11138-11140	B, D

CONFIDENTIALITY
DENIED
- MISSING -

EA02-027

Attachment to August 11, 2004 Petition for Reconsideration
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	Bates Label Range	Type of Confidential Information
EA02-027	B 10930-10932	B, D
EA02-027	B 8004-8005	B, D
EA02-027	G 21515-21517	B
EA02-027	C 1022-1023	B
EA02-027	B 8275-8277	B
EA02-027	B 8006-8007	B
EA02-027	11822-11824	B
EA02-027	C 2470-2472	B
EA02-027	13308-13310	B
EA02-027	C 0731-0733	B
EA02-027	C 2209-2211	B
EA02-027	A 16140-16142	B
EA02-027	A 12138-12139	B
EA02-027	A 11136-11137	B
EA02-027	3184-3186	B
EA02-027	C 11414-11418	B, D
EA02-027	B 10944-10946	B
EA02-027	A 3320-3321	B
EA02-027	C 11397-11398	B
EA02-027	C 11548-11551	B
EA02-027	C 11552-11553	B
EA02-027	3196-3198	B
EA02-027	20207-20209	B
EA02-028	C 11423-11424	B
EA02-027	A 12136-12137	B
EA02-027	A 11801-11803	B
EA02-027	A 11134-11135	B
EA02-027	A 16135-16137	B
EA02-027	C 2204-2206	B
EA02-027	C 0728-0730	B
EA02-027	14420-14421	B
EA02-027	11817-11819	B
EA02-027	B 8010-8011	B

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Bates Label Range		Type of Confidential Information
EA02-027	B 8988-8990	B
EA02-027	G 21510-21512	B
EA02-027	C 1024-1025	B
EA02-027	13303-13305	B, D
EA02-027	B 10884-10886	B, D
EA02-027	A 12052-12054	B, D
EA02-027	A 3313-3315	B, D
EA02-027	15663-15665	B, D
EA02-027	A 11131-11133	B
EA02-027	G 21504-21506	B
EA02-027	B 8008-8009	B
EA02-027	11814-11816	B
EA02-027	C 2464-2466	B
EA02-027	13298-13300	B
EA02-027	A 16132-16134	B
EA02-027	C 0725-0727	B
EA02-027	B 10775-10777	B
EA02-027	3202-3204	B
EA02-027	20641-20643	B
EA02-027	C 6751-6753	B
EA02-027	C 6754-6756	B
EA02-027	A 3308-3310	B
EA02-027	B 11766-11768	B
EA02-027	D 7990-7993	B
EA02-027	C 11425-11427	B
EA02-027	A 12134-12135	B
EA02-027	A 11695-11697	B
EA02-027	A 11129-11130	B
EA02-027	C 12508-12511	B
EA02-027	G 21828-21831	B
EA02-027	G 21720-21723	B
EA02-027	G 21498-21500	B
EA02-027	G 21494-21497	B

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	Bates Label Range	Type of Confidential Information
EA02-027	B 8012-8013	B
EA02-027	B 8281-8283	B
EA02-027	G 27761-27764	B
EA02-027	11811-11813	B
EA02-027	C 2458-2460	B
EA02-027	14412-14415	B
EA02-027	13318-13320	B
EA02-027	A 16120-16122	B
EA02-027	C 1161-1162	B
EA02-027	30141-30145	B
EA02-027	B 8480-8481	B
EA02-027	B 10797-10799	B
EA02-027	G 5385-5388	B
EA02-027	G 5394-5396	B
EA02-027	D 3337-3340	B
EA02-027	G 5289-5293	B
EA02-027	3208-3210	B
EA02-027	C 6760-6762	B
EA02-027	20635-20637	B
EA02-027	A 3382-3384	B
EA02-027	B 11776-11780	B
EA02-027	B 11763-11765	B
EA02-027	D 7994-7996	B
EA02-027	A 11127-11128	B, D
EA02-027	B 7999-8000	B, D
EA02-027	B 8994-8996	B, D
EA02-027	B 8348-8350	B, D
EA02-027	11800-11802	B, D
EA02-027	C 0722-0724	B, D
EA02-027	D 1869-1871	B, D
EA02-027	C 11380-11382	B, D
EA02-027	C 2519-2521	B, D
EA02-027	A 16105-16107	B, D

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Dates Label Range		Type of Confidential Information
EA02-027	A 16108-16110	B, D
EA02-027	A 16111-16113	B, D
EA02-027	C 6767-6769	B, D
EA02-027	13409-13411	B, D
EA02-027	B 8473-8475	B, D
EA02-027	20391-20393	B, D
EA02-027	20210-20212	B, D
EA02-027	C 1163-1164	B, D
EA02-027	G 2561-2563	B, D
EA02-027	A 3377-3379	B, D
EA02-027	13336-13338	B
EA02-027	13390-13392	B
EA02-027	A 16236-16238	B
EA02-027	A 16204-16207	B
EA02-027	C 0947-0950	B
EA02-027	C 0719-0721	B
EA02-027	C 0716-0718	B
EA02-027	G 11786-11788	B
EA02-027	3500-3503	B
EA02-027	3273-3276	B
EA02-027	3470-3472	B
EA02-027	3269-3272	B
EA02-027	3236-3239	B
EA02-027	C 6770-6773	B
EA02-027	20626-20628	B
EA02-027	20398-20400	B
EA02-027	20394-20397	B
EA02-027	20235-20238	B
EA02-027	D 1883-1885	B
EA02-027	D 1886-1889	B
EA02-027	D 1890-1893	B
EA02-027	D 1894-1897	B
EA02-027	D 1898-1901	B

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Bates Label Range			Type of Confidential Information
EA02-027	B	11781-11783	B
EA02-027	A	3525-3527	B
EA02-027	A	3502-3504	B
EA02-027	A	3484-3487	B
EA02-027	A	3508-3510	B
EA02-027	A	3372-3374	B
EA02-027	B	8468-8470	B
EA02-027	A	12132-12133	B
EA02-027	G	21485-21487	B
EA02-027	B	7994-7996	B, D
EA02-027	B	7997-7998	B
EA02-027	B	8286-8288	B
EA02-027	B	8345-8347	B, D
EA02-027		11447-11450	B, D
EA02-027		11451-11454	B, D
EA02-027		11455-11458	B, D
EA02-027		11459-11462	B, D
EA02-027		11463-11466	B, D
EA02-027		11467-11470	B, D
EA02-027		11471-11474	B, D
EA02-027		11475-11478	B, D
EA02-027		11479-11482	B, D
EA02-027		11483-11486	B, D
EA02-027		11487-11490	B, D
EA02-027		11491-11494	B, D
EA02-027		11495-11498	B, D
EA02-027		11790-11792	B, D
EA02-027		11443-11446	B, D
EA02-027		11499-11502	B, D
EA02-027		11503-11506	B, D
EA02-027		11507-11510	B, D
EA02-027		11511-11514	B, D
EA02-027		11515-11518	B, D

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Bates Label Range		Type of Confidential Information
EA02-027	11523-11526	B, D
EA02-027	11535-11538	B, D
EA02-027	11527-11530	B, D
EA02-027	11531-11534	B, D
EA02-027	11519-11522	B, D
EA02-027	11539-11542	B, D
EA02-027 A	11125-11126	B, D
EA02-027	11543-11546	B, D
EA02-027	11547-11550	B, D
EA02-027 C	2510-2511	B, D
EA02-027 C	2333-2336	B, D
EA02-027 C	2449-2451	B
EA02-027	14403-14407	B
EA02-027 A	14922-14923	B
EA02-027	20081-20083	B
EA02-027	20078-20080	B
EA02-027	19992-19994	B
EA02-027 D	8716-8717	B
EA02-027 C	6710-6712	B
EA02-027 G	28733-28735	B
EA02-027 G	28730-28732	B
EA02-027	20218-20220	B
EA02-027 C	6356-6357	B
EA02-027 B	8391-8392	B
EA02-027 A	3303-3304	B
EA02-027 C	6360-6361	B
EA02-027	20221-20223	B
EA02-027 G	28723-28725	B
EA02-027 C	6717-6719	B
EA02-027 A	14406-14407	B
EA02-027 B	8014-8015	B
EA02-027 C	6394-6399	B, D
EA02-027 B	11650-11655	B, D

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	Bates Label Range	Type of Confidential Information
EA02-027	B 11638-11644	B, D
EA02-027	B 11607-11615	B, D
EA02-027	B 11556-11564	B, D
EA02-027	C 6419-6423	B, D
EA02-027	C 6414-6418	B, D
EA02-027	B 11524-11532	B, D
EA02-027	A 9697-9700	B, D
EA02-027	A 15981-15988	B, D
EA02-027	A 15989-15995	B, D
EA02-027	A 14433-14439	B, D
EA02-027	A 14426-14432	B, D
EA02-027	A 14412-14417	B, D
EA02-027	A 14373-14378	B, D
EA02-027	A 14361-14365	B, D
EA02-027	C 924-931	B, D
EA02-027	C 2551-2558	B, D
EA02-027	C 2544-2550	B, D
EA02-027	C 11587-11592	B, D
EA02-027	B 10071-10076	B, D
EA02-027	B 10063-10067	B, D
EA02-027	B 10052-10053	B, D
EA02-027	20501-20507	B, D
EA02-027	13226-13228	B
EA02-027	C 2284-2286	B
EA02-027	A 3299-3300	B
EA02-027	C 6412-6413	B
EA02-027	C 2408-2410	B
EA02-027	C 6728-6730	B
EA02-027	B 11672-11674	B
EA02-027	D 8517-8519	B, D
EA02-027	B 11572-11577	B, D
EA02-027	A 4927-4929	B, D
EA02-027	B 11537-11541	B, D

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Bates Label Range		Type of Confidential Information
EA02-027	A 11750-11753	B, D
EA02-027	A 3494-3496	B, D
EA02-027	G 27075-27078	B, D
EA02-027	G 27079-27081	B, D
EA02-027	A 3494-3496	B, D
EA02-027	20232-20234	B, D
EA02-027	14437-14439	B, D
EA02-027	A 12155-12156	B, D
EA02-027	1185B-11860	B, D
EA02-027	C 2640-2642	B, D
EA02-027	B 10936-10937	B
EA02-027	A 11488	B
EA02-027	A 11490-11491	B
EA02-027	A 16070	B
EA02-027	13237	B
EA02-027	14440	B
EA02-027	B 11387	B
EA02-027	B 11366	B
EA02-027	B 11339	B
EA02-027	C 6382	B
EA02-027	11849	B
EA02-027	C 636	B
EA02-027	C 2315	B
EA02-027	B 8244	B
EA02-027	C 6743	B
EA02-027	B 8025	B
EA02-027	A 12153	B
EA02-027	A 11180	B
EA02-027	A 11178	B
EA02-027	G 21585	B
EA02-027	B 9112	B
EA02-027	G 27945	B
EA02-027	A 3472	B

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Bates Label Range			Type of Confidential Information
EA02-027	A	3346	B
EA02-027		3128	B
EA02-027	G	27942	B
EA02-027	A	16064	B
EA02-027	C	633	B
EA02-027		13271	B
EA02-027	C	2310	B
EA02-027		11844	B
EA02-027	C	1017	B
EA02-027	C	6378	B
EA02-027	B	8027	B
EA02-027	B	8249	B
EA02-027	G	21570	B
EA02-027	A	12151	B
EA02-027	B	11389	B
EA02-027	B	8254	B
EA02-027	G	21565	B
EA02-027	A	12148	B
EA02-027	B	8983	B
EA02-027	B	9134	B
EA02-027	D	4568	B
EA02-027	C	1019	B
EA02-027	D	1877	B
EA02-027	D	8546	B
EA02-027	C	.694	B
EA02-027	C	2305	B
EA02-027	B	11324	B
EA02-027		13266	B
EA02-027		14431	B
EA02-027	A	3337	B
EA02-027	B	10901	B
EA02-027	B	8029	B
EA02-027	C	6373	B

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	Bates Label Range	Type of Confidential Information
EA02-027	C 12497-12499	B
EA02-027	C 12500-12503	B, D, F
EA02-027	C 2416-2417	B, D
EA02-027	20321-20322	B
EA02-027	D 8480-8481	B
EA02-027	F 0016R-0018R	B, D
EA02-027	F 0033R-0035R	B, D
EA02-027	F 0039R-0041R	B, D
EA02-027	F 0042R-0044R	B, D
EA02-027	F 0045R-0047R	B, D
EA02-027	F 0048R-0050R	B
EA02-027	F 0052R-0053R	B, G
EA02-027	F 0092R-0093R	B
EA02-027	F 00124R-00125R	B
EA02-027	F 00150R-00152R	D
EA02-027	F 00478R-00480R	B, D
EA02-027	F 00493R-00495R	B
EA02-027	F 00501R-00503R	B
EA02-027	F 00504R-00506R	B, D
EA02-027	F 00507R-00509R	B
EA02-027	F 00510R-00511R	B
EA02-027	F 00512R-00514R	B
EA02-027	F 00515R-00516R	B, G
EA02-027	F 00517R-00519R	B
EA02-027	F 00520R-00523R	B, D
EA02-027	F 00528R-00530R	B, D
EA02-027	F 00531R-00534R	B
EA02-027	F 00534R-00536R	B, D
EA02-027	F 00533R-00560R	B, D
EA02-027	F 00564R-00569R	B, D
EA02-027	F 00572R-00577R	B, D
EA02-027	F 00581R-00585R	B, D
EA02-027	F 00586R-00594R	B, D

CONFIDENTIALITY
 DENIED
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Bates Label Range	Type of Confidential Information
EA02-027 F 00597R-00601R	B, D
EA02-027 F 00602R-00608R	B, D
EA02-027 F 00615R-00616R	B
EA02-027 F 00621-00623R	B, D
EA02-027 F 00630R-00632R	B, F
EA02-027 F 00647R-00649R	B, D
EA02-027 F 00675R-00682R	B, D
EA02-027 F 00687R-00693R	B, D
EA02-027 F 00916R-00918R	B, G
EA02-027 F 00919R-00921R	B
EA02-027 F 00922R-00924R	B
EA02-027 F 00928R-00933R	B, D
EA02-027 F 00937R-00942R	B, D
EA02-027 F 00946R-00949R	B, D
EA02-027 F 00952R-00954R	B, D
EA02-027 F 001094R-001095R	B
EA02-027 F 001097R-001098R	B
EA02-027 F 001109R-001111R	B, D
EA02-027 F 001227R-001229R	B
EA02-027 F 001255R-001258R	B
EA02-027 F 001293R-001295R	B
EA02-027 F 001313R-001315R	B, F
EA02-027 F 001316R-001318R	B
EA02-027 F 001339R-001341R	B, D
EA02-027 F 001354R-001357R	B, D
EA02-027 F 001367R-001368R	B, D
EA02-027 F 001381R-001382R	B, D
EA02-027 F 001383R-001384R	B, G
EA02-027 F 001404R-001406R	B, D
EA02-027 F 001413R-001414R	B
EA02-027 F 001426R-001427R	B, D
EA02-027 F 001434R-001436R	B
EA02-027 F 001440R-001443R	B, D

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 - List of Documents Contained in Boxes 63, 64, and 65 -

Bates Label Range	Type of Confidential Information
EA02-027 F 0019R-0020R	B
EA02-027 31496-31498	B, D
EA02-027 F 31512-31514	B
EA02-027 C 5894-5899	B
EA02-027 B 10772-10774	B
EA02-027 A 4962-4964	B, D, F
EA02-027 3961-3976	B, C, D
EA02-027 4282-4302	A, B, C, D, E, G
EA02-027 5977-6000	A, B, C, D, G
EA02-027 D 4793-4795	A, B, G
EA02-027 21590-21594	A, B
EA02-027 17168	A, B, C
EA02-027 25508-25515	A, B, C
EA02-027 D 6790-6843	A, B, C, D, E, F, G
EA02-027 3617-3620	B, C, D
EA02-027 D 8525-8529	A, B, C, D, G
EA02-027 D 8028-8040	B, C, G
EA02-027 A 4471-4473	A, B, C, D, E
EA02-027 A 4930-4933	B, C, G
EA02-027 A 5084-5085	B, C, G
EA02-027 A 5086-5100	A, B, C, G
EA02-027 A 5101-5124	A, B, C, D, G
EA02-027 2758-2761	A, B, C, G
EA02-027 D 1440-1451	B, C, D, E
EA02-027 D 1452-1461	B, C, D, E
EA02-027 19967-19969	B, C, G
EA02-027 C 2787-2790	B, C
EA02-027 C 2791-2793	B, C, G
EA02-027 20788-20815	B, C, E, G
EA02-027 20879-20910	B, C, E, G
EA02-027 C 5334-5335	B, C
EA02-027 20477-20500	A, B, C, D, E
EA02-027 20987-21022	B, C, D, G

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Bates Label Range	Type of Confidential Information
EA02-027 B 11482-11490	B, C
EA02-027 B 9511-9543	A, B, C, D, E, G
EA02-027 B 9560-9615	A, B, C, D, E, G
EA02-027 B 8389-8395	B, C
EA02-027 B 11224-11262	A, B, C, D, E, G
EA02-027 B 11296-11317	A, B, C, D, E, G
EA02-027 B 11196-11221	A, B, C, D, E, G
EA02-027 C 12487-12493	B, C
EA02-027 B 7981-7982	B, C
EA02-027 B 7983-7984	B, C
EA02-027 B 8928-8934	B, C, F
EA02-027 C 0613-0615	A, B, C, D, G
EA02-027 B 10255-10314	A, B, C, D, E, G
EA02-027 B 8902-8907	B, C, F
EA02-027 B 8913-8914	B, C
EA02-027 B 8915-8917	B, C
EA02-027 B 8918-8920	B, C
EA02-027 B 8939-8943	B, C
EA02-027 B 8961-8964	B, C
EA02-027 B 8965-8968	B, C
EA02-027 B 8969-8974	B, C
EA02-027 12965-13062	B, C, G
EA02-027 14386-14387	B, C
EA02-027 14388	B, C
EA02-027 14401-14402	B, C
EA02-027 13371	G
EA02-027 13372	A, B, C, F
EA02-027 13373-13374	A, B, C, F
EA02-027 12243-12251	A, B, C
EA02-027 13050-13051	B, C, F
EA02-027 D 13840-13851	B, C, G
EA02-027 G 76232-76239	B, C
EA02-027 D 13874-13910	B, C, E, G

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Bates Label Range	Type of Confidential Information
EA02-027 D 13912-13949	B, C, E, G
EA02-027 A 14613-14624	A, B, C, D, E
EA02-027 A 14653-14657	A, B, C, D, E
EA02-027 A 16153-16164	A, B, C, D, E
EA02-027 10163-10164	A, B, C
EA02-027 12365	B, C, D
EA02-027 A 11617-11618	B, C, G
EA02-027 A 11384-11385	B, C, G
EA02-027 D 4225-4228	B, C
EA02-027 C 6825-6827	A, B, C, F
EA02-027 C 6440-6441	A, B, C, F
EA02-027 G 27041-27042	A, B, C, F
EA02-027 C 2507-2509	A, B, C, F
EA02-027 A 4009	B, C, E
EA02-027 21323-21324	A, B, C, E
EA02-027 A 11105-11107	B, C
EA02-027 14396-14399	B, C
EA02-027 3716-3717	A, B, C, D, E
EA02-027 9623	B, C
EA02-027 14442	B, C
EA02-027 C 12461-12472	B, C, G
EA02-027 A 11147-11150	B, C
EA02-027 A 8597-8598	B