

*Ford Motor Company*

NHTSA  
FORD MOTOR CO 20590

2004 AUG 12 A 10:41

James P. Vondra, Director  
Automotive Safety Office  
Environmental & Safety Engineering

OFFICE OF CHIEF  
COUNSEL

August 11, 2004

Ms. Jacqueline Glassman, Esq.  
Chief Counsel  
National Highway Traffic Safety Administration  
400 Seventh Street, S.W.  
Washington, D.C. 20590

Dear Ms. Glassman:

**Subject: Petition for Reconsideration of NHTSA's Denial of Confidential Treatment of Documents Submitted in Response to EA02-027:NVS-212am**

Enclosed are 65 boxes of documents referenced in the Ford Motor Company (Ford) March 10, 2003 response to NHTSA's inquiry EA02-027:NVS-212am for which Ford seeks confidential treatment. This letter provides support for Ford's claim of confidentiality in accordance with 49 CFR Part 512.8. Also enclosed is one box (No. 6) that contains documents for which Ford originally requested confidential treatment; however, upon further review we are no longer requesting confidential treatment for these materials but are including them with this submission.

This letter provides more detailed support for Ford's August 4, 2003 claim of confidentiality. Ford requests confidential treatment for those documents that contain privileged or confidential commercial information exempt from disclosure pursuant to 49 CFR § 512.15, 5 U.S.C. § 552(b)(4), and 49 U.S.C. § 30167.

Ford requests confidential treatment for the documents included in Boxes 63, 64, and portions of 65 because the documents are not customarily released to the public by Ford and because the documents contain confidential business information, the disclosure of which would likely cause substantial competitive harm to Ford (as contemplated in 49 CFR § 512.15, 5 U.S.C. § 552(b)(4), and 49 U.S.C. § 30167). These documents (more specifically identified below) contain the following types of information:

- A. Information concerning the internal process by which Ford and its suppliers study and resolve issues communicated to Ford by its customers. Such commercially sensitive information was developed at the expense of Ford, and could be used by competitors to improve their own products and processes without the need to invest the substantial resources invested by Ford;



- B. Information concerning Ford's confidential business practices pertaining to methods for recognizing, determining root cause and preventing future concerns, and other commercially sensitive information concerning Ford's internal business processes. Such information was developed at the expense of Ford, and could be used by competitors to improve their own products and processes without the need to invest the substantial resources invested by Ford;
- C. Information concerning assessments and evaluations conducted by suppliers or Ford that could be used by competitors to improve or modify their products, processes, or supplier base without the need to invest the substantial resources invested by Ford to develop the information;
- D. Information concerning or revealing Ford's testing programs, including test specifications and results that could be used by competitors to improve their own products and processes without the need to invest the substantial resources invested by Ford;
- E. Engineering drawings, design specifications and standards, process mode effect analyses and failure mode effect analyses that could be used by competitors to develop or improve their own products and processes without the need to invest the substantial resources invested by Ford;
- F. Information concerning the financial impact to Ford of the underlying issue that could be used by competitors to identify quality issues and modify competitive strategies to the detriment of Ford;
- G. Information concerning Ford's analysis of warranty data that could be used by competitors to identify quality issues and modify competitive strategies to the detriment of Ford.

Attached is a list of documents contained in Boxes 63, 64, and 65 that identifies to which of the above-enumerated categories each of the documents belong.

Ford requests confidential treatment for the documents included in Boxes 1-5, 7-62, and 66 because they contain confidential and commercially sensitive information that is being provided to NHTSA voluntarily, and are not customarily released to the public by Ford. Ford asserts that the documents included in these boxes are being produced voluntarily because they 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). Further, documents contained in the following boxes relate to a vehicle component that is not included in the agency's definition of "Subject Components" found in its December 12, 2002 inquiry: 5, 8-11, 14, 16, 18, 19, 21, 24, 26-29, 32, 35, 39, 40, 42, 43, 45, 46, 49-51, 53, 54, 57, 60 and 61.

Additionally, public disclosure would be likely to impair NHTSA's ability to obtain the type of information contained in Boxes 1-5, and 7-66 in the future. Indeed, disclosure of this information may require Ford to reconsider and modify its records management and document creation practices.

The documents in Boxes 1-5, and 7-66 contain financial and/or commercial information and are exempt from disclosure pursuant to 49 CFR § 512.15, 5 U.S.C. § 552(b)(4), and 49 U.S.C. § 30167. If part of a page contains confidential information, the confidential portion has been bracketed by hand and marked with the letter "C", and the top margin has been stamped "CONFIDENTIAL." If an entire page of a hard copy or electronic document contains confidential information, it has been stamped "ENTIRE PAGE CONFIDENTIAL" along the margin. These notations on the confidential documents were made as part of this response to this inquiry. CD-ROMS containing confidential information have been identified as confidential by marking the label of the CD-ROM with the word "CONFIDENTIAL."

Ford documents of the types included in this request for confidentiality are maintained under a record keeping system which is intended to control dissemination of this material within Ford, and to assure that the material is not disseminated outside of Ford, except as described in the attached certification, which is made pursuant to 49 CFR Part 512.4(b). Neither NHTSA nor other Federal agencies nor Federal courts have made final determinations relating to the confidentiality of the submitted information or similar information, to the best of our knowledge.

Certain documents provided in Boxes 1-5, and 7-66 contain supplier and Ford trade secret and/or commercial information provided to Ford by suppliers during the course of the internal process by which Ford and its suppliers study and resolve issues communicated to Ford by its customers. Documents of this type are maintained under a record keeping system which is intended to control dissemination of this material as described in the forthcoming supplier certifications. Dissemination of this material would cause substantial competitive harm to Ford and its suppliers if not granted confidential status.

Ford requests that these documents be granted confidential treatment by the agency for a period of ten years. Earlier disclosure of these documents, in Ford's opinion, would result in substantial competitive harm.

In the event that the agency should conclude that all or part of the submitted information is not to be given confidential treatment, Ford asks the agency to provide reasonable notice of not less than ten working days prior to any contemplated disclosure in order that Ford may pursue such legal remedies as it may choose. Please direct all notices to Paul Fabien, Ford Motor Company, Suite 1400, Parklane Towers West, Three Parklane Blvd., Dearborn, MI 48126, (313) 621-1656, or by e-mail at pfabien2@ford.com. Thank you for your continuing courtesy.

Sincerely,



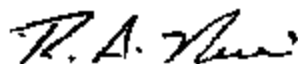
James P. Vondale

Attachments

**CERTIFICATE IN SUPPORT OF REQUEST  
FOR CONFIDENTIALITY**

I, R. A. Nevi, pursuant to the provisions of 49 CFR Part 512, state as follows:

1. I am Assistant Director, Global Automotive Safety Compliance, Automotive Safety Office, and I am authorized by Ford Motor Company (Ford) to execute documents of this nature on behalf of Ford;
2. The information contained in the boxes referenced in Ford's letter to NHTSA's Office of the Chief Counsel dated August 11, 2004 contain confidential and proprietary data and is submitted with the claim that it is entitled to confidential treatment under 5 U.S.C., § 552(b)(4);
3. A member of my staff has inquired of the responsible Ford personnel who have authority in the normal course of business to release the type of information for which a claim of confidentiality has been made to ascertain whether such information has ever been released outside Ford;
4. Based upon such inquiries, to the best of my knowledge, information and belief, the information for which Ford has claimed confidential treatment has never been released or become available outside Ford except as hereinafter specified:
  - Portions of these documents may have been or may be shared with Ford suppliers with the expectation that they will be kept confidential.
  - During the course of defending itself in litigation, Ford may have been, or may be required to produce such information.
5. I make no representations beyond those contained in this certificate and, in particular, I make no representations as to whether this information may become available outside Ford because of unauthorized or inadvertent disclosure, except as stated in Paragraph 4; and
6. I certify under penalty of perjury that the foregoing is true and correct. Executed on this the 11th day of August 2004.



R. A. Nevi

## 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	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

## EA02-027

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	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

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	Bates Label Range	Type of Confidential Information
EA02-027	A 11139-11161	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	C 41710-41712	B
EA02-027	G 3082-3083	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

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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 2346-2547	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



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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

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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

## EA02-027

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Boxes 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 8333-8338	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

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EA02-027	Box 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

## Attachment to August 11, 2004 Petition for Reconsideration

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Bates 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

## EA02-027

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	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 8575-8578	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

## EA02-027

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Bates Label Range			Type of Confidential Information
EA02-027	B	10989-10995	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

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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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Dates 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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Bates 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 2510-2513	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	O 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	O 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 100071-100076	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	11858-11860	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	13257	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 00553R-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

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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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	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 6790-6845	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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	Notes 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 9560-9635	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 8613-8615	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	12245-12251	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