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JUN 20 2006

Mr. James P. Vondale  
Ford Motor Company  
Automotive Safety Office  
Environmental & Safety Engineering  
Fairlane Plaza South  
330 Town Center Drive  
Dearborn, MI 48126

Re: Confidentiality Determination/EA04-034

Dear Mr. Vondale:

This is in response to your letter, dated June 8, 2006, requesting confidential treatment for certain materials submitted by Ford Motor Company (Ford) on May 24, 2006 in response to a series of agency information requests (April 21, 2006, May 12, 2006, and May 16, 2006) from Jeffrey Quandt regarding alleged defects with wheels used on certain Ford Crown Victoria Police Interceptor vehicles. The materials are contained in a CD in a folder identified as "2006-06-08 Confidential Appendix A". The folder contains two files, labeled "HL Weld Process.pdf" and "HL Weld Repair Spec. pdf". You have also provided the necessary third party certification from Hayes-Lemmerz International (Hayes-Lemmerz). Ford requests that this information be kept confidential for a period of ten (10) years.

Ford states that the submitted information is not customarily disclosed to the public and that its disclosure would reveal the weld inspection and repair specifications followed by its supplier (Hayes-Lemmerz). Ford also claims that the information reveals its supplier's manufacturing process. The disclosure of this information, Ford asserts, would allow competitors to improve their own products and processes without the need to make similar investments as Ford and its supplier have made. Ford also contends that these materials were submitted voluntarily.

I have decided to grant your request.

The agency reviewed Ford's claim for confidential treatment under the test announced in *National Parks & Conservation Ass'n v. Morton*, 498 F.2d 765 (D.C. Cir. 1974) and its progeny. Under that test, information is confidential under Exemption 4 of the Freedom of Information Act, 5 U.S.C. § 552(b)(4), if its disclosure is likely to cause substantial competitive harm to the submitter or to impair the government's ability to collect the information in the future.

As described above, the materials submitted by Ford reveal the inspection, repair, and manufacturing processes followed by its wheel supplier. The disclosure of this information would be likely to cause substantial competitive harm to Ford and its supplier by allowing competitors to obtain commercially valuable manufacturing-related information that is not readily available to the public. Accordingly, the files "HL Weld Process.pdf" and "HL Weld Repair Spec. pdf" will be withheld under Exemption 4.

Because Ford's request has been granted under the *National Parks* standard, there is no need to evaluate your claim that this material was voluntarily submitted to ODI.

This grant of confidential treatment is subject to certain conditions. The information may be disclosed under 49 CFR § 512.22 based upon newly discovered or changed facts, and you must inform the agency of any changed circumstances that may affect the protection of the information. 49 CFR § 512.10. If necessary, you will be notified prior to the release of any information under the procedures established by our regulations. 49 CFR § 512.22 (b).

Sincerely,



Otto G. Matheke, III  
Senior Attorney

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