

JUL 15 2005

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

Re: Confidentiality Determination/PE04-078

Dear Mr. Fabien:

This is in response to Mr. James P. Vondale's letter, dated March 16, 2005, requesting confidential treatment for certain materials submitted by Ford Motor Company ("Ford") in response to an agency information request regarding alleged defects in speed control deactivation switches in MY 2000 Expeditions, F-150s and Lincoln Navigators. Mr. Vondale's letter is an amended request that supercedes his previous request of February 3, 2005. The materials are contained in six PDF files contained on a CD-ROM identified as "PE04-078 Appendices A-F."

Ford states that this information is not customarily released to the public and that the documents contain confidential business information, the disclosure of which would likely cause substantial competitive harm to Ford. Ford requests that this information be kept confidential for a period of ten (10) years.

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.

Ford's submission consists of internal manufacturing process studies, test results and specifications, engineering drawings and specifications, detailed information pertaining to cost and internal documents summarizing warranty analysis. This information is not readily

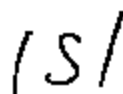
available to the public. Further, the agency believes that the disclosure of this detailed information would be likely to cause Ford to suffer substantial competitive harm. Accordingly, I am according confidential treatment to the materials described above.

In addition, certain of the information not marked for confidential treatment contains identifying information for consumers and owners of Ford vehicles. All such personally identifying information, including the last six digits of any vehicle identification numbers ("VIN") will be accorded confidential treatment pursuant to Exemption 6 of FOIA, 5 U.S.C. § 552(b)(6). This information is in Appendix E, bates stamped PE04-078 6519 - PE04-078 6548.

Subject to the conditions below, this grant of confidential treatment will remain in effect for ten (10) years.

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

