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

**Subject: Request Under 49 CFR Part 512 for Confidential Treatment of Information**

This letter provides support for Ford's claim of confidentiality in accordance with 49 CFR Part 512.8. Ford requests confidential treatment for those documents that contain privileged and confidential commercial information exempt from disclosure pursuant to 49 CFR § 512.15, and 5 U.S.C. § 552(b)(4).

Ford requests confidential treatment for the documents provided electronically on the enclosed CD as Appendices I, II, III-A and III-B (file names: 2005-06-24\_Appendix\_I, II, III-A, III-B) 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, and 5 U.S.C. § 552(b)(4)).

The information in Appendix I for which Ford seeks confidential treatment consists of detailed warranty analysis which could be used by competitors to modify competitive strategies, including marketing strategies, to the detriment of Ford.

The information in Appendix II for which Ford seeks confidential treatment includes test specifications and reliability analysis and projections which could be used by competitors to identify quality issues and modify competitive components and strategies to the detriment of Ford.

The information in Appendix III-A for which Ford seeks confidential treatment includes detailed projections of mileage accumulation rates that could be used by competitors to modify competitive strategies, including marketing strategies, to the detriment of Ford.

The information in Appendix III-B for which Ford seeks confidential treatment includes detailed information concerning the probabilistic models and statistical procedures incorporated in Ford's Analytical Warranty System. Such information could be used by competitors to construct or improve their own probabilistic models without the need to devote the substantial resources devoted by Ford to construct and prove the usefulness of its models.

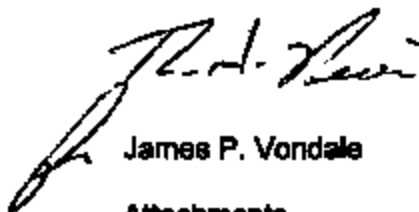
Those pages that contain confidential information have been marked "ENTIRE PAGE CONFIDENTIAL" along the top margin as part of this submission.

Ford documents of this type 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 determinations relating to the confidentiality of the submitted information or similar information, to the best of our knowledge.

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 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, telephone (313) 621-1656. Thank you for your continuing courtesy.

Sincerely,



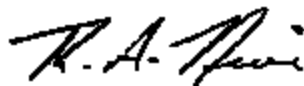
James P. Vondale

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 attachment to Ford's letter to NHTSA's Office of the Chief Counsel dated June 24, 2005 contains 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 24<sup>th</sup> day of June, 2005.



R. A. Nevi

*Ford Motor Company*

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

June 24, 2005

Ms. Kathleen C. DeMeter, Director  
Office of Defects Investigation Safety Assurance  
National Highway Traffic Safety Administration  
400 Seventh Street, S.W.  
Washington, D.C. 20590

Dear Ms. DeMeter:

Subject: EA05-003

The Ford Motor Company (Ford) response to a June 9, 2005 e-mail from Mr. Scott Yon of the agency requesting additional information concerning Ford Super Duty and Excursion vehicles equipped with 6.0 liter diesel engines is attached. As discussed in a June 22, 2005 telephone call with Mr. Yon, Ford is gathering and reviewing owner and field reports and warranty claims for responsiveness to Request 3 of the e-mail. We anticipate providing this information to the agency no later than July 29, 2005.

If you have any questions concerning this response, please feel free to contact me.

Sincerely,

  
James P. Vondale

Attachment



Item 1:

Ford will check slide 7 and see why the number of VOQs does not add up to the number of vehicles reported in the chart and advise what the discrepancy is and how it will be resolved.

Response:

A typographical error in the summary text identified the number of VOQ VINs as 68 when the actual number is 81, which is consistent with the number identified within the chart. Additionally, in a June 2, 2005 telephone discussion, Mr. Scott Yon inquired about the distribution of the vehicles identified in VOQs within the vehicle populations identified in Ford's presentation. The corrected VOQ Analysis slide and a slide identifying the vehicle distribution are being provided electronically as Appendix I with a request for confidentiality under separate cover to the agency's Office of the Chief Counsel pursuant to 49 CFR, Part 512.

Item 2:

Ford will review the content of slides 38, 47, 54 and 72 and ensure that text font sizes are legible on both electronic (screen) and printed version.

Response:

The identified slides have been formatted to provide legible information. The re-formatted slides are being provided electronically as Appendix II with a request for confidentiality under separate cover to the agency's Office of the Chief Counsel pursuant to 49 CFR, Part 512.

Item 3:

Ford will provide new Appendix A and Appendix C data to the same specification as in Ford's PE04070 IR letter response but including data up to the same date the 5/18/2005 presentation was based on (4/30/2005). Please advise the likely delivery schedule and whether your submission will contain the PE data or only the new/additional data.

Response:

As discussed in a June 22, 2005, telephone call with Mr. Yon, Ford is gathering and reviewing owner and field reports and warranty claims. We expect to provide the requested information to the agency no later than July 29, 2005. The submission will provide data that is incremental to our earlier response.

Item 4:

We didn't discuss this in the phone call, but I had previously asked (via email of 5/2/2005) if the subject vehicle owner's manual gives any instruction regarding what to do if an engine stall occurs, either while stopped or while moving. Can you please investigate and advise further?

June 24, 2005

Response:

As discussed in a June 16, 2005 telephone call with Mr. Yon, the owner guides for the subject vehicles do not include any operating instructions specific to an engine stall event.

Item 5:

I think Kurt said there was some other/additional data in connection with the mileage accumulation chart Ford provided that he could supply to help us better understand the analysis. Can you check with him on this please?

Response:

The requested information is being provided electronically as Appendices III-A and III-B with a request for confidentiality under separate cover to the agency's Office of the Chief Counsel pursuant to 49 CFR, Part 512.

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