

Ford Motor Company

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

APR 19 2 30 PM '05

April 15, 2005

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

Dear Ms. Glassman:

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

Two copies of information referenced in the Ford Motor Company (Ford) April 15, 2005 response to the agency's March 11, 2005 inquiry, EA04-024 are attached. Also attached, for your convenience, is a copy of Ford's response to the ODI information request.

This letter provides support for Ford's claim of confidentiality in accordance with 49 CFR Part 512.8. Ford requests confidential treatment for the copies of documents included in Appendix G and Appendix J 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). The information in these documents is organized into categories in Attachment I.

Ford documents of the types listed 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.

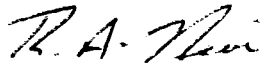
The documents in Appendices G and J contain commercial information and are exempt from disclosure pursuant to 49 CFR § 512.15, 5 U.S.C. § 552(b)(4), and 49 U.S.C. § 30167.

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 Kara Tertzag, Ford Motor Company, Suite 1400, Parklane Towers West, Three Parklane Blvd., Dearborn, Michigan 48126. Ms, Tertzag may also be contacted by telephone at (313) 323-8559, or by e-mail at ktertzag@ford.com. Thank you for your continuing courtesy.

Sincerely,



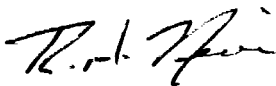
James P. Vondale

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 attachment to Ford's letter to NHTSA's Office of the Chief Counsel dated April 15, 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 15th day of April 2005.



R. A. Nevi

Request for the Confidential Treatment of Documents

Tab	Document Type	Document Description	Reason for Confidential Treatment
G	Engineering Design Drawings	Ford Motor Company's and its suppliers' release level drawings of its vehicles, systems, sub-systems, and components.	The details contained in release level drawings contain Ford proprietary intellectual property and 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.
J	Engineering Design Specifications	Internal Ford Motor Company document containing necessary information to be used by Ford and its suppliers to produce or evaluate parts which are usually issued in conjunction with engineering drawings during the design and development of its vehicles.	Information concerning Ford's engineering design processes 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.

EA04-024
FORD
5/2/2005
ATTACHMENT
DRAWING