July 25, 2005

Ms. Jacqueline Glassman, Esq. Chief Counsel National Highway Traffic Safety Administration 400 Seventh Street, S.W. Washington, DC 20590 DaimlerChrysler Corporation Stephan J. Speth Director

Vehicle Compliance & Safety Affairs

Re: Request for Confidential Treatment for Certain Documents Provided

In Response to EA 04-025

Dear Ms. Glassman:

DaimlerChrysler Corporation has submitted information to the Office of Defects Investigation relating to EA 04-025. In connection with that submission, DaimlerChrysler is submitting assembly plant process installation instructions and component drawings that are referenced in Enclosures 10 and 16 in EA 04-025 and provided via the enclosed files to the Office of Chief Counsel and requesting that they be permanently protected from public release pursuant to 49 C.F.R. Part 512.

DaimlerChrysler has carefully reviewed its submission and has identified that the file contains confidential information, the disclosure of which, would cause competitive harm. The justifications for confidential treatment are set forth below.

#### **Class Determinations**

The documents submitted contain engineering blueprints and/or drawings containing information relating to the process of production. The information contained on these renderings could not be otherwise obtained except after significant reverse engineering. Further, DaimlerChrysler Corporation has maintained the confidentiality of the information contained on these blueprints and drawings and has insisted that any suppliers who have received this information do the same.

The certification required by the applicable regulations is attached to this letter. If you need any clarifications or additional information, please contact me at (248) 512-4188. If you receive a request for disclosure of these documents before you have completed your review of our claim for confidential treatment, DaimlerChrysler respectfully requests notification of the request and an opportunity to provide further justification for the confidential treatment of this information, if warranted.

Sincerely,

Stephar J. Speth

cc: Kathleen C. DeMeter

Attachment and Enclosure

#### Certificate in Support of Request for Confidentiality

- I, Stephan J. Speth, pursuant to the provisions of 49 C.F.R. Part 512, state as follows:
- (1) I am DaimlerChrysler Corporation's Director, Vehicle Certification, Compliance and Safety Affairs and I am authorized by DaimlerChrysler to execute documents on behalf of DaimlerChrysler.
- (2) The information contained in the indicated documents is confidential and proprietary data and is being submitted with the claim that is entitled to confidential treatment under 5 U.S.C. 552 (b) (4).
- (3) I have personally inquired of the responsible DaimlerChrysler personnel who have authority in the normal course of business to release the information for which a claim of confidentiality has been made to ascertain whether such information has ever been released outside DaimlerChrysler, except as to DaimlerChrysler suppliers with the understanding that such information be kept confidential.
- (4) Based upon such inquiries, to the best of my knowledge, information, and belief, the information for which DaimlerChrysler has claimed confidential treatment has never been released or become available outside DaimlerChrysler, except as stated in Paragraph 3; and
- (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 DaimlerChrysler because of unauthorized or inadvertent disclosure; and
- (6) I certify under penalty of perjury that the foregoing is true and correct.

Executed on this 25<sup>th</sup> day of July, 2005.

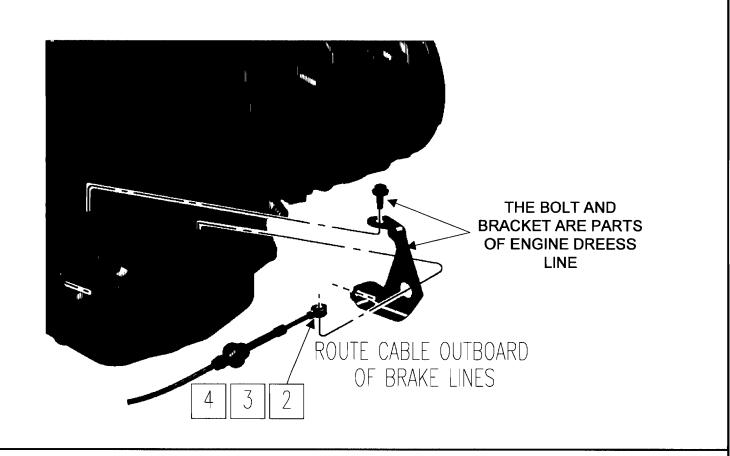
Mr. Stephan J. Speth

RELEASED

IR # 02FK0236\_17 IR Source # 02FK0236

AMPS PROCESS SHEET

Report Created: 12-13-2004 15:42:06 Last Modified By: AVILA, MOISES



□=Process ○=Part △=Note

Program: 2006DRDH Division: ASSEMBLY

Plant: NY Center: T/C/F Platform: MEXICO SPECIAL REQUIREMENTS Status: RELEASED 12/13/2004

Component Traceability
Shield - Non-Torque
Diamond - Non-Torque
Shield - Torque
Diamond - Torque

Carline: 381267

Body Style: 41 42 62 81

2006-9103-DRDH-17

Engr: JUAN AVILA

FLOOR CONS & GEARSHIFT CN Prev yr sht: 2005-9103-DRDH-17

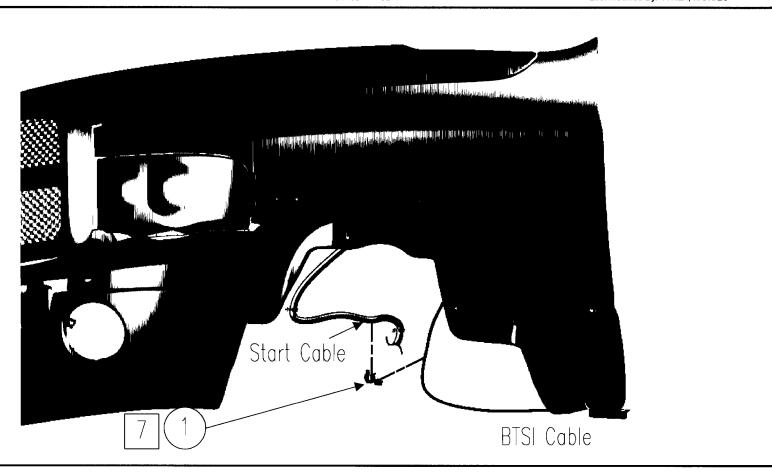
CONNECT BTSI CABLE TO TRANSMISSION

Page: 1 of 3

IR # 02FK0074\_17 IR Source # 02FK0074

# RELEASED AMPS PROCESS SHEET

Report Created: 12-13-2004 15:42:06 Last Modified By: AVILA, MOISES



Des essession COCCDDDLL	
Program: 2006DRDH	
Division: ASSEMBLY	

□=Process ○=Part △=Note

Plant: NY
Center: T/C/F
Platform: MEXICO

S	PECIAL REQUIREMENTS	Status:	RELEASED	12/13/2004
	Component Traceability			
	Shield - Non-Torque			
	Diamond - Non-Torque			
	Shield - Torque	l		

Diamond - Torque

Carline: 3 8 1 2 6 7 Body Style: 41 42 62 81

Engr: JUAN AVILA

FLOOR CONS & GEARSHIFT CN Prev yr sht: 2005-9103-DRDH-17

CONNECT BTSI CABLE TO TRANSMISSION

2006-9103-DRDH-17

Page: 2 of 3

#### AMPS PROCESS SHEET

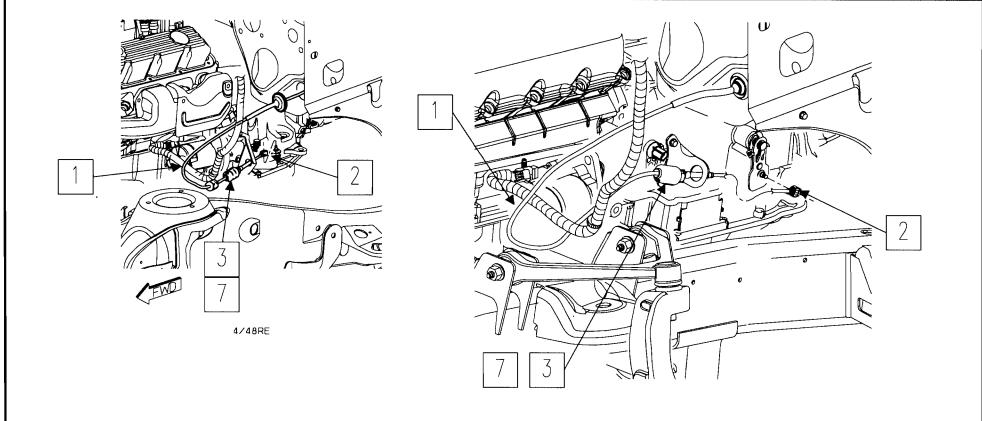
Report Created: 12-13-2004 15:42:06 Last Modified By: AVILA, MOISES

Item	Operation Description	Tool#/Fixture	Ρ1	Item	Operation Descripti	on.	Tool#/Fixture	₽1
	NOTE: NOTE CHECK SBS SHEET FOR SALES CODE							
1	OBTAIN STARTER CABLE RETAINING CLIP(06503441)							
2	FEED THE FREE END OF THE CABLE THROUGH THE HOLE IN THE TRANSMISSION SHIFT BRACKET							
3	GRASP THE TRANSMISSION TERMINAL END OF THE CABLE							
4	SNAP CABLE ONTO THE PIN ON THE TRANSMISSION SHIFT LEVER							
5	PUSH THE CABLE THROUGH THE TRANSMISSION BRACKET HOLE UNTIL BOTH SNAP TABS EXPAND AND ARE LOCKED TO THE BRACKET FACE							
6	PUSH AND PULL ON THE CABLE TO ENSURE BOTH TABS ARE LOCKED							
7	CLIP THE SHIFT CABLE TO THE POSITIVE BATTERY CABLE BY THE LEFT UPPER CONTROL ARM WITH CLIP							
8	NOTE: PRIOR TO ADJUSTING THE CABLE: VERIFY BOTH THE COLUMN LEVER AND THE TRANSMISSION SHIFT LEVER ARE IN PARK							$  \  $
9	ROTATE THE REAR PROPSHAFT UNTIL THE PARK PAWL MECHANISM IN THE TRANSMISSION SNAPS IN							
	NOTE: IF OPERATOR CANNOT PERFORM THE OPERATION AS SPECIFIED, NOTIFY THE TEAM LEADER OR SUPERVISOR IMMEDIATELY							
	NOTE: IF OPERATOR FINDS A DAMAGED OR INCORRECT FART, PLACE PART IN DESIGNATED LOCATION OR NOTIFY THE TEAM LEADER OR SUPERVISOR							
	2006DRDH SPECIAL REQUIREMENTS Status	RELEASED 12/13	/200	4	Carline: 3 8 1 2 6 7	Engr: JUAN AVILA		
Division:	ASSEMBLY Component Traceability				Body Style: 41 42 62 81 FLOOR CONS & GEARSHIFT CN	Prev vr sht: 200	05-9103-DRDH-17	
Plant: Center:	Ni Diamond - Non-Tomus				CONNECT BTSI CABLE TO TRANSMISSIO			$\neg$
	MEXICO Diamond - Torque				2006-9103-DRDH-17		Page: 3 of	3

AMPS PROCESS SHEET

Report Created: 05-03-2005 16:02:07 Last Modified By: NGUYEN, HUNG

IR # 06IK3248
IR Source # BTSIAMPS3



5/45RFE

□=Process ○=Part △=Note

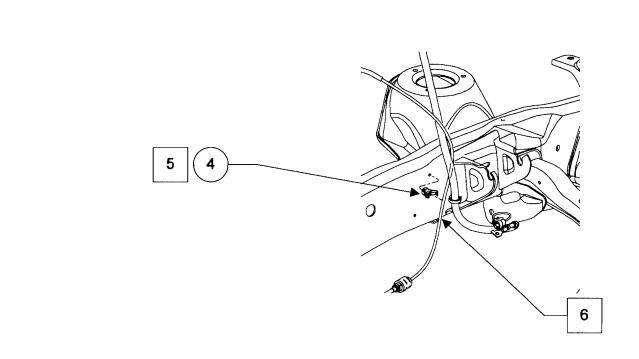
en P	<b>/</b> M	Part No.	VF	Qty	Part Name	T	Carline	Units	Res	-Mir	צַל ו	n-Ni	1 AC	lgl-Ni	in Sn	ug	TCDyr	-Min	PCMA-Min
				UNC		NTO	Bodystyles	Audit	Res	-Tar	נם :	n-Ta	: AC	lgl-Te	ar AC	ND-Nir	TCDYE	-Tar	TCMA-Nax
- 1	L					S/D	Engine	TQ-8/1	Res	-Max	נ [ם]	n-Ma	t AC	lg1-M	T AC	MD-Max	TCDyr	-Max	
		VSC	Mrkt	Ser	Sales Codes		Transmission				Ad	ditio	mal	Torq	ue II	aforma	tion		
T		32000404	DH	1	CLIP BRAKE LINE		1267												
				EX	AUTO TRANS SHIFT CABLE TO FRAME		41426281				T		1				1		
	L						EZ0												
	ſ	6240	λ	A	ST		DG0												
			<del></del>	VSC Mrkt 32000404 DH	VSC Mrkt Ser 32000404 DH 1 EA	VSC Mrkt Ser Sales Codes  32000404 DH 1 CLIP BRANE LINE EA AUTO TRANS SHIFT CABLE TO FRAME	VSC Mrkt Ser Sales Codes  32000404 DH 1 CLIP BRAKE LIME EA AUTO TRANS SHIFT CABLE TO FRAME	VSC Mrkt Ser Sales Codes S/D Engine  32000404 DH 1 CLIP BRAKE LIME 1267 EA AUTO TRANS SHIFT CABLE TO FRAME EZ0	UN	UN	VSC Mrkt Ser Sales Codes Transmission  1 CLIP BRAKE LIME 1267 EA AUTO TRANS SHIFT CABLE TO FRAME E20	UM	UN	UN UN NTQ Bodystyles Audit Res-Tar Dyn-Tar ACI S/D Engine TQ-S/D Res-Max Dyn-Max ACI S/D Engine TQ-S/D Res-Max Dyn-Max ACI Transmission Additional  32000404 DH 1 CLIP BRAKE LINE 1267 1267 1267 1267 1267 1267 1267 1267	UN	UM NTQ Bodystyles Audit Res-Tar Dyn-Tar ACAgl-Tar AC VSC Mrkt Ser Sales Codes Transmission Additional Torque It 32000404 DH 1 CLIP BRAKE LINE 1267 EA AUTO TRANS SHIFT CABLE TO FRAME E20	UM NTQ Bodystyles Audit Res-Tar Dyn-Tar ACAgl-Tar ACND-Hin S/D Engine TQ-S/D Res-Max Dyn-Max ACAgl-Max ACND-Max VSC Mirkt Ser Sales Codes Transmission Additional Torque Informa 32000404 DH 1 CLIP BRAKE LIME 1267 EA AUTO TRANS SHIFT CABLE TO FRAME EZO EZO	UM RTQ Bodystyles Audit Res-Tar Dyn-Tar ACAgl-Tar ACMD-Min TCDyn S/D Engine TQ-S/D Res-Max Dyn-Max ACAgl-Max ACMD-Max TCDyn VSC Mrkt Ser Sales Codes Transmission Additional Torque Information  32000404 DH 1 CLIP BRANE LIME 1267 EA AUTO TRANS SHIFT CABLE TO FRAME E20	WE Sales Codes Transmission Additional Torque Information  32000404 DH 1 CLIP BRANE LINE AUTO TRANS SHIFT CABLE TO FRAME E20 E20 E20 E20 E20 E20 E20 E20 E20 E2

SPECIAL REQUIREMENTS Status: RELEASED 3/20/2005 Program: 2006DH Carline: 7 Engr: GERALD THOMPSON Rev A: 5/3/2005 Nature of Change: prt txt ill PART 32000404 ADDED Component Traceability Body Style: 41 42 Division: ASSEMBLY Shield - Non-Torque FLOOR CONS & GEARSHIFT CN GC Plant: Diamond - Non-Torque SECURE BTSI CABLE TO TRANS BRACKET Center: T/C/F Shield - Torque Platform: TRUCK PT Diamond - Torque 2006-9103-DH-4.5 Page: 1 of 3

# RELEASED AMPS PROCESS SHEET

IR # 06CK0622\_01 IR Source # 06CK0622

Report Created: 05-03-2005 16:02:07 Last Modified By: NGUYEN, HUNG



□=Process ○=Part △=Note

Program: 2006DH Division: ASSEMBLY Plant: GC Center: T/C/F

Platform: TRUCK PT

Component Traceability Rev

Component Traceability
Shield - Non-Torque
Diamond - Non-Torque
Shield - Torque
Diamond - Torque

SPECIAL REQUIREMENTS Status: RELEASED 3/20/2005

Rev A: 5/3/2005 Nature of Change: prt txt ill PART 32000404 ADDED Carline: 7

Body Style: 41 42

FLOOR CONS & GEARSHIFT CN
SECURE BTSI CABLE TO TRANS BRACKET

2006-9103-DH-4.5

Page: 2 of 3

Engr: GERALD THOMPSON

### AMPS PROCESS SHEET

Report Created: 05-03-2005 16:02:07 Last Modified By: NGUYEN, HUNG

Item	Operation Description	Tool#/Fixture	P1	Item	Operation Descripti	on	Tool#/Fixture	P1
1	OBTAIN EXISTING LOOSE CABLE							ŦŦ
	NOTE: CABLE-MAKING SURE THAT CABLE WAS ROUTED OUTBOARD OF BRAKELINES AND ROUTE THRU BRACKET ASSEMBLY							
2	POSITION CABLE FITTING OVER BALL STUD OF TRANS SHIFT LEVER AND PRESS ON TO SECURE							
3	PUSH PLASTIC END-FITTING INTO ATTACHING HOLE IN BRACKET UNTIL IT SNAPS-CABLE MUST BE RETAINED IN BRACKET							
4	OBTAIN CLIP FROM STOCK							
5	INSERT XMAS FULLY TREE TO FRAME							
6	ATTACH BSTI CABLE TO CLIP UNTIL SEATED IN PLACE		<b> </b>					
7	MOVE LEVER ALL WAY REARWARD INTO PARK POSITION							
								<b> </b>
						1		
			!					
Program:	2006DH SPECIAL REQUIREMENTS Statu	JS: RELEASED 3/20/20	<u>니</u> )05		Carline: 7	Engr. GERALD THO	OMPSON	Ц
Division:	ASSEMBLY Component Traceability Rev A	A: 5/3/2005 e of Change: prt txt ill			Body Style: 41 42		0011	$\neg$
Plant: Center:	Diamond - Non-Torque PART	32000404 ADDED			FLOOR CONS & GEARSHIFT CN SECURE BTSI CABLE TO TRANS BRACKET			$\dashv$
	TRUCK PT Shield - Torque Diamond - Torque						<u> </u>	ot
	- James Grand				2006-9103-DH-4.5		Page: 3 of	3

IR Source # BITSICAB

IR # 06IK3228

# RELEASED

AMPS PROCESS SHEET

Report Created: 03-20-2005 11:38:05 Last Modified By: THOMPSON, GERALD



Program:	2006DH
Division:	ASSEMBLY
Division	00

Plant: GC Center: T/C/F Platform: TRUCK PT SPECIAL REQUIREMENTS Status: RELEASED 3/20/2005

Component Traceability Shield - Non-Torque Diamond - Non-Torque Shield - Torque Diamond - Torque Carline: 7 Body Style: 41 42

**FLOOR CONS & GEARSHIFT CN** 

SECURE BTSI CABLE CLIPS TO STEERING COLUMN

2006-9103-DH-3.5

Page: 1 of 2

Engr: GERALD THOMPSON

#### AMPS PROCESS SHEET

Report Created: 03-20-2005 11:38:05 Last Modified By: THOMPSON, GERALD

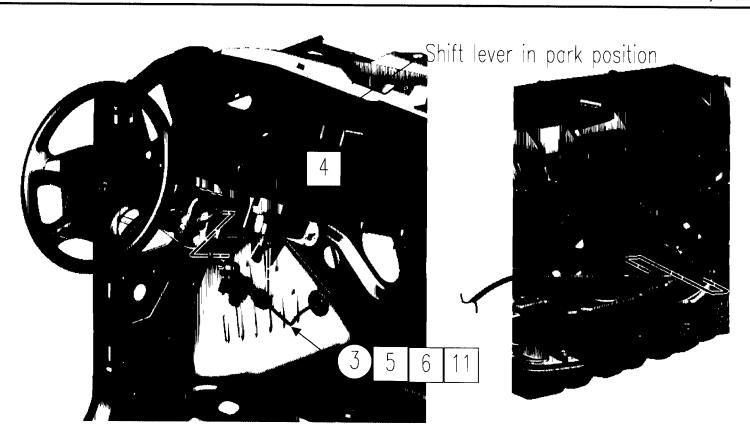
Item	Operation Description	Tool#/Fixture	Ρ1	Item	Operation Description	ın	Tool#/Fixture	ю
1	SECURE LOWER BTSI CABLE CLIP FIRST		F	2002.	operation bestripero	11	1001#/FIXture	#
2	SECURE UPPER BTSI CABLE CLIP SECOND							
3	PULL AND DISCARD GRENADE PIN							
	NOTE: THESE STEPS MOST BE PERFORMED IN THE PROPER SEQUENCE							
			Н					
								l
			П					
Program:	2006DH SPECIAL REQUIREMENTS Status	RELEASED 3/20/2	005		Carline: 7	Engr: GERALD THO	MPSON	Ч
	ASSEMBLY GC Component Traceability Shield - Non-Torque				Body Style: 41 42 FLOOR CONS & GEARSHIFT CN			
Center:	T/C/F   Shield - Torque				SECURE BTSI CABLE CLIPS TO STEERING (	COLUMN		$\neg$
Platform:	TRUCK PT Diamond - Torque				2006-9103-DH-3.5		Page: 2 of 2	2

IR # 02FK0023\_21 IR Source # 02FK0023

### **RELEASED**

AMPS PROCESS SHEET

Report Created: 07-07-2005 13:14:03 Last Modified By: THOMPSON, GERALD



□=Process ○=Part △=Note

Item  P/N	Part No.	VF	Qty	Part Name	T	Carline	Units	Res-Min	Dvn-Mi	ACAg1-M	n Snug	TCDyn-Min	TCMA-Mir
			UM		NTO	Bodystyles						TCDyn-Tar	
					S/D	Engine	TQ-S/D	Res-Nax	Dyn-Ma:	ACAgl-Ma	x ACMD-Max	TCDyn-Max	
	VSC	Mrkt	Ser	Sales Codes		Transmission			Addition	onal Torq	e Informat	ion	
3	52107846AG	DH	1	CABLE ASSY AUTO TRANS SHIFT		1267						T	
			EA	<b>A</b>		41426281							
	6240	A	λ	ST		DG8	-	<u> </u>		1			
3	52107847AG	DH	1	CABLE ASSY AUTO TRANS SHIFT		1267	<del></del>				1	T	
			EA			41426281							
	6240	A	λ	ST		DGQ							
Program	: 2006DH		SPE	CIAL REQUIREMENTS Status: RELEASED 12/10/2004		Carline: 27	7			Engr: GE	RALD THOMPS	SON	
Division:	ASSEMBLY		Co	mponent Traceability Rev B: 7/7/2005 CN: 50524T18 Nature of Change: prt	V-2		41 42 8		CN		bt: 2005.0		

Plant: GC Center: T/C/F

Platform: TRUCK PT

Diamond - Non-Torque Shield - Torque Diamond - Torque

(52107847AH) S/B 52107847AG

FLOOR CONS & GEARSHIFT CN

Prev yr sht: 2005-9103-DH-2 AUTOMATIC SHIFT CABLE WITH BTSI

2006-9103-DH-2

Page: 1 of 3

#### AMPS PROCESS SHEET

Report Created: 07-07-2005 13:14:03 Last Modified By: THOMPSON, GERALD

Item	Operation Description	Tool#/Fixture	р1	Item	Operation Descripti		Tool#/Firsture	D 1
1	NOTE: ITEMS 2,8,9,10 & 11 REFER TO AMPS-2002 7414	- TOOTH/TIACGIE		13	PULL CABLE THRU GROMMET FROM EXTERI		Tool#/Fixture	Pl
2	INSERT STEERING COLUMN THROUGH DASH. HAND START BOTTOM TWO FASTENERS TO IP. (REFER TO AMPS 7414 DR 3)				IS REMOVED	ON GNIII SBACK		
3	OBTAIN TRANSMISSION BTSI AND INSERT CABLE THROUGH DASH							
4	NOTE: ENSURE STEERING COLUMN SHIFT LEVER IS IN THE PARK POSITION.	3						
5	PICK-UP THE COLUMN TERMINAL END OF THE CABLE AND SNAP IT ONTO THE PIN ON THE COLUMN SHIFT LEVER USING: BITSI CABLE HAND TOOL	4SDRSL9103-001LH						
	VERIFY THE BLACK BTSI ADJUSTMENT LOCKING CLIP FACES DOWNWARD. LET THE CABLE DANGLE DOWNWARD, TO ENSURE ACCESS TO THE STEERING COLUMN BOLTS.							
6	ATTACH ELECTRICAL HARNESS TO STEERING COLUMN. (REFER TO AMPS 2002-7414DR-SHEET 4)							$\  \ $
7	CONNECT THE ELECTRICAL AIRBAG CONNECTORS. (REFER TO AMPS 2002-7414DR SHEET 5)							Н
8	ATTACH THE LOWER AND UPPER COLUMN SHROUDS. (REFER TO AMPS 2002-7414DR SHEET 6)							
9	FASTEN THE STEERING COLUMN TO THE DASH. POSITION THE COLUMN, HAND START THE TOP TWO FASTENERS, THEN PULL COLUMN ASSEMBLY REARWARD. TIGHTEN THE TOP TWO FASTENERS FIRST, THEN THE BOTTOM TWO FASTENERS. (REFER TO AMPS 2002-7414DR SHEET 5)							
10	PICK-UP THE TRANSMISSION BTSI CABLE AND SLIDE IT INTO THE STEERING COLUMN SHIFT BRACKET. ALIGN THE WHITE CABLE ADJUSTMENT LOCKING CLIP(PIA), SO THAT IT FACES DOWNWARD. PULL CABLE TO SNAP THE CABLE LOCKING TABS IN THE BRACKET. MAKE SURE BOTH SNAP TABS EXPAND AND ARE LOCKED TO THE BRACKET FACE. PUSH/PULL THE CABLE TO ENSURE BOTH TABS ARE LOCKED. VERIFY THE PULL PIN IS ATTATCHED TO THE CABLE. (CAUTION: DO NOT SHIFT COLUMN LEVER UNTIL CABLE IS CONNECTED TO TRANSMISSION AND ADJUSTED)							
11	ATTACH ELECTRICAL CONNECTOR TO BTSI SOLENOID. (PIA TO CABLE)							
12	PULL CABLE GROMMET FROM EXTERIOR UNTIL IT SEATS.							
Program:	2006DH   SPECIAL REQUIREMENTS   Status	S: RELEASED 12/10/2	200	4	Carline: 2 7	Engr: GERALD TH	OMPSON	Н
	ASSEMBLY Component Traceability Rev B:	7/7/2005 CN: 50524T18			Body Style: 41 42 81	<u> </u>		$\dashv$
Plant:	GC   Shield - Non-Torque   Nature   (52107	of Change: prt 847AH) S/B			FLOOR CONS & GEARSHIFT CN	Prev yr sht: 200	05-9103-DH-2	
Center:	T/C/F   Shield - Torque   521078				AUTOMATIC SHIFT CABLE WITH BTSI			
Platform:	TRUCK PT Diamond - Torque				2006-9103-DH-2		Page: 2 of 3	3

#### AMPS PROCESS SHEET

Report Created: 07-07-2005 13:14:03 Last Modified By: THOMPSON, GERALD

Item	Operation Description	Tool#/Fixture	Ρ1	Item	Operation Descript	ion	Tool#/Fixture	Ρ1
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Program:	2006DH SPECIAL REQUIREMENTS	Status: RELEASED 12/10/	2004	4	Carline: 2 7	Engr: GERALD THO	OMPSON	$\dashv$
Division:	ASSEMBLY Component Traceability	Rev B: 7/7/2005 CN: 50524T18 Nature of Change: prt (52107847AH) S/B		V-2A	Body Style: 41 42 81			ヿ
Plant:	GC Shield - Non-Torque Diamond - Non-Torque	(52107847AH) S/B			FLOOR CONS & GEARSHIFT CN AUTOMATIC SHIFT CABLE WITH BTSI	Prev yr sht: 200	5-9103-DH-2	_
Center:	T/C/F Shield - Torque Diamond - Torque	52107847AG						
r lautitiii.	Diamond - Torque				2006-9103-DH-2		Page: 3 of 3	3