



May 3, 2006

Stephen Wood, Esq.
 Office of Chief Counsel
 NHTSA Safety Assurance
 Room #5219
 400 Seventh Street, S.W.
 Washington, D.C. 20590

GM-687

NVS-213/day
 EA04-034

Dear Mr. Wood:

Enclosed with this letter are three copies of General Motors' (GM) May 3, 2006 response to NHTSA's information request (IR), dated March 28, 2006, concerning an ongoing NHTSA investigation of alleged steel wheel fracture in certain model year (MY) 2003 through 2006 Ford Crown Victoria Police Interceptor vehicles manufactured by Ford Motor Company. The GM subject peer vehicles for which information is requested are MY 2003 through 2005 Chevrolet Impala (9C1 Police Package) vehicles. Two copies include the confidential documents and the third does not.

GM requests the document stamped "GM Confidential" be afforded confidential treatment without a time limitation by the NHTSA. This is included in the electronic CD identified as GM Confidential Attachment 1 CD Response to Q8. This information is not customarily made public by GM and contains trade secrets and commercial information which is privileged or confidential under 5 U.S.C. Section 552(b)(4), 49 CFR Part 612 and 49 U.S.C. Section 30167(a).

The following table identifies the specific types of confidential information contained in the GM document for which confidentiality is sought:

Response	Location \ Document Name	Information Types
8	GM Confidential Attachment 1 CD Response to Q8 Engineering Drawing/Specifications	Engineering Drawing/Specifications GM Confidential

To the best of our knowledge, no prior determinations of the confidentiality of this document have been made by the NHTSA, other Federal Agencies, or the Federal Courts. Documents such as those containing engineering drawings and engineering specifications, to the best of our knowledge, normally have been granted confidential treatment by the NHTSA in the past.

GM requests confidential treatment of the information in this document because it includes engineering drawings and specifications, disclosure of which would cause substantial competitive harm. GM submits that the competitive harm would be substantial, because the design and manufacture of vehicles and vehicle components are the core of its business and because global competition in that business is intense.

The document on the Confidential Attachment 1 CD labeled Response to Q8 discloses GM's engineering drawing and specifications. The development of specifications and component drawings involves significant time, development effort, and money to plan and execute. The documents associated with this effort provide valuable information that a competitor would otherwise have to spend its time and money to develop and investigate. This would deprive GM of the competitive advantage of its efforts without any compensation.

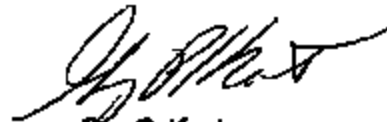
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GM treats the above material as confidential proprietary information available only to authorized GM and supplier personnel and not otherwise available to the public. The document is maintained under a record-keeping system which is intended to control dissemination of this material within GM, and to assure that it is not disseminated outside the Corporation, except as described in the attached certification made pursuant to 49 CFR Part 512.4(e).

The corresponding electronic copies of this document are being provided on a CD labeled "GM CONFIDENTIAL." If a request for disclosure of any or all of this information is received by the NHTSA, GM requests notification of receipt of each such request and, if necessary, an opportunity to further explain the reasons why such material is trade secret and commercial information which should not be disclosed under the applicable statutes and regulations.

Please contact me if you require further information about this request.

Sincerely,



Gay P. Kent
Director
Product Investigations

Enclosures
2 CDs
1 Copy of Response w/o Confidential Info
2 Copies of Response w/Confidential Info

CERTIFICATE IN SUPPORT OF REQUEST FOR CONFIDENTIALITY

I, Gay P. Kent, pursuant to the provisions of 49 CFR Part 512, state as follows:

- (1) I am Director of Product Investigations of GM Corporation and am authorized to execute this certificate on its behalf.
- (2) I certify that the information contained in the document identified in the letter dated May 3, 2006 is confidential and proprietary data and is being submitted with the claim that it is entitled to confidential treatment under 5 U.S.C. 552(b)(4) and 49 C.F.R. Part 512.
- (3) I hereby request that the information be protected without a time limitation.
- (4) This certification is based on the information provided by the responsible GM personnel who have responsibility for the document being provided to NHTSA for which a claim of confidentiality has been made.
- (5) Based on that information, to the best of my knowledge, information and belief, the information for which GM has claimed confidential treatment has never been released or made available outside GM and supplier or customer personnel.
- (6) 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 GM because of unauthorized or inadvertent disclosure.
- (7) I certify under penalty of perjury that the foregoing is true and correct. Executed on this the 3rd day of May 2006.



Gay P. Kent
Director
Product Investigations

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ATTACHMENT "1"
GM NON-CONFIDENTIAL MATERIAL

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GM CONFIDENTIAL MATERIAL
ATTACHMENT "1"