



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

Fairlane Plaza South
330 Town Center Drive
Dearborn, MI 48126-2738 USA

January 5, 2007

Mr. Anthony M. Cooke
Chief Counsel
National Highway Traffic Safety Administration
Room 5219
400 Seventh Street, S.W.
Washington, DC 20590

Dear Mr. Cooke:

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

Reference: EA04-034:NVS-213dsy

Ford voluntarily submits the attached documents in response to the agency's informal request for testing information made during a telephone conference on December 13, 2006. The confidential documents are contained within Appendix A on the attached compact disc.

This letter provides support for claims of confidentiality by Ford in accordance with 49 CFR Part 512.8. Ford requests confidential treatment for the attached documents on the following grounds: (1) the documents are being provided to NHTSA voluntarily, and are not customarily released to the public by Ford; and (2) disclosure of the information, which consists of testing procedures and data would be likely to result in substantial competitive harm under 49 CFR § 512, 49 CFR § 512.15, and 5 U.S.C. § 552(b)(4).

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 Ford's knowledge.

The document contains commercial information and is exempt from disclosure pursuant to 49 CFR § 512.15, 5 U.S.C. § 552(b)(4). The pages of the documents for which Ford requests confidential treatment are labeled "ENTIRE PAGE CONFIDENTIAL."



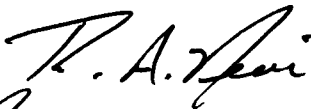
January 5, 2007

Ford requests that this document be granted confidential treatment by the agency for a period of ten years. Earlier disclosure of the 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 written notices to me at Ford Motor Company, Suite 500, Fairlane Plaza South, 330 Town Center Drive, Dearborn, Michigan 48126. Please direct all non-written communication to Mr. Fabien, who may be contacted by telephone at (313) 621-1656.

Thank you for your continuing courtesy.

Sincerely,



James P. Vondale

Attachment

**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 January 5, 2007, 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 to the public;
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 to the public 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 to the public 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 5th day of January 2007.



R. A. Nevi