



NHTSA  
WASHINGTON, DC 20590

2007 FEB -1 P 2: 36

OFFICE OF CHIEF  
COUNSEL

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

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

January 31, 2007

Mr. Anthony M. Cooke  
Chief Counsel  
National Highway Traffic Safety Administration  
400 Seventh Street, S.W., Room 5219  
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 document in response to the agency's informal request for testing information made during telephone conversations in January 2007. The confidential document is 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 document on the following grounds: (1) the document is being provided to NHTSA voluntarily, and is 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).

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 document for which Ford requests confidential treatment are labeled "ENTIRE PAGE CONFIDENTIAL."

Ford requests that this document be granted confidential treatment by the agency for a period of ten years. Earlier disclosure of this document, in Ford's opinion, would result in substantial competitive harm.

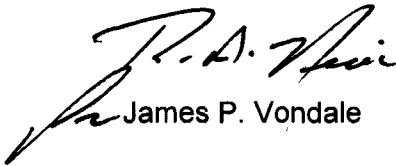
In the event that the agency should conclude that all or part of the submitted information is not to be given confidential treatment, Ford asks the agency to provide reasonable notice of not less than ten working days prior to any contemplated disclosure in order that Ford may pursue such



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. Paul Fabien who may be contacted by telephone at (313) 621-1656.

Thank you for your continuing courtesy.

Sincerely,



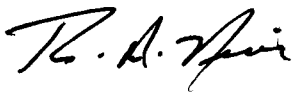
James P. Vondale

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 this certificate on its behalf;
2. The information contained in the attachment to Ford's letter to NHTSA's Office of the Chief Counsel dated January 31, 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 the 31st day of January 2007.



R. A. Nevi