



March 23, 2005

Jacqueline Glassman, Esq.
 Chief Counsel
 National Highway Traffic
 Safety Administration
 Room 5219
 400 Seventh Street, S.W.
 Washington, D.C. 20590

GM-864A

NVS-212mj
 EA04-035

Dear Ms. Glassman:

Enclosed with this letter are three copies of General Motors' (GM's) March 22, 2005 response to NHTSA's information request (IR), dated January 28, 2005, regarding alleged malfunction or failure of the front turn signals on 2003-2005 Model Year (MY) Saturn Ion Coupe vehicles. Two copies include the confidential documents and the third does not.

GM requests the documents stamped "GM Confidential" be afforded confidential treatment without a time limitation by the NHTSA. These are included in the electronic CD identified as Attachment 2 CD, GM Confidential. 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 512 and 49 U.S.C. Section 30167(e).

The following identifies the specific types of confidential information contained in each document:

Response	Folder Name	Information Types
11	Response to Q11 Component Technical Specifications and Part drawings	Component and test specifications, test set-up, testing results and part drawings.
12	Response to Q12 Part drawings and test reports. Diagnostics, Functional, and EMC Test Results.	Component drawings and validation test results.
13	Attachment 13E Presentation to NHTSA January 13, 2005 and backup material	Quality analysis, warranty data, root cause analysis, diagrams, investigation information, material test results, and corrective actions.

GM requests confidential treatment of the information in these documents because it includes trade secrets, 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.

Documents in response to questions 11, 12, and 13 identified above, on the CD labeled Attachment 2 GM Confidential, disclose GM's test procedures, results of product development, performance testing and warranty analysis. The development of test procedures involves time, effort, and skill. Knowledge of how GM tests and evaluates a product would give a competitor valuable information that it would otherwise have to spend its time and money to develop, and therefore would deprive GM of the competitive advantage of its efforts without any compensation. These test procedures and results, warranty data and quality information would give competitors insight into GM's methodologies and business practices for evaluating its products.

Several of the documents in response to question 13 identified above, on the CD labeled Attachment 2, GM Confidential, disclose GM's investigation procedures and results. The conduct of an investigation involves time, development effort, and money to plan and execute. A product of the investigation would give a competitor valuable information that it 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.

Several documents in response to questions 11 and 12 identified above, on the CD labeled Attachment 2 GM Confidential, contain engineering part specifications and other design data. This information would give competitors insight into GM's methodologies and disclose confidential information about the design and performance of its products, without spending their own resources or compensating GM for the knowledge they would gain.

GM treats the above material as confidential proprietary information available only to authorized GM, supplier, and customer personnel who have a business need for them, and are not otherwise available to the public. These documents are maintained under a record-keeping system that is intended to control dissemination of this material within GM, supplier and customer personnel, and to assure that it is not freely disseminated outside the Corporation. Multiple security systems are used to limit access to facilities and record storage systems where confidential information is stored and employees receive training in information security policies and procedures.

To the best of our knowledge, the NHTSA, other Federal Agencies, or the Federal Courts have made no prior determinations of the confidentiality for these documents. These types of documents, however, have normally been granted confidential treatment by the NHTSA in the past, to the best of our knowledge.

The documents subject to this request for confidentiality are being provided and have been clearly stamped "GM CONFIDENTIAL." If a request for disclosure of any or all of this information is received by the NHTSA, General Motors 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.

If you require further information about this request, please do not hesitate to call.

Sincerely,

Gay P. Kent
Director
Product Investigations

Enclosures

**CERTIFICATE IN SUPPORT OF REQUEST FOR
CONFIDENTIALITY**

EAD4-035/GM-884A

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

- (1) I am Director of Product Investigations of General Motors Corporation (GM) and am authorized to execute this certificate on its behalf.
- (2) I certify that the information contained in the documents identified in the letter dated March 23, 2005 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 documents 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 23rd day of March 2005.



Gay P. Kent
Director
Product Investigations



Iwona Niec Villaire
Senior Counsel

March 21, 2005

Jacqueline Glassman, Esq.
Chief Counsel
National Highway Traffic
Safety Administration
Room 5219
400 Seventh Street, S.W.
Washington, D.C. 20590

GM-664A

NVS-212mj
EA04-035

Dear Ms. Glassman:

Enclosed with this letter are three copies of General Motors (GM) March 22, 2005 response to NHTSA's information request (IR), dated January 28, 2005, regarding allegations of turn signal/DRL lamp failures on Model Year (MY) 2003-2005 Saturn Ion Coupe vehicles. Two copies include the confidential documents and the third does not.

Federal-Mogul requests the documents stamped "Confidential" be afforded confidential treatment without a time limitation by NHTSA. These are included in the electronic CD identified as Attachment 3CD. This information is not customarily made public by Federal-Mogul or General Motors and contains trade secrets and commercial information which is privileged or confidential under 5 U.S.C. Section 552(b)(4), 49 CFR Part 512 and 49 U.S.C. Section 30167(a).

The following identifies the specific types of confidential information contained in each document:

Response	Document Name	Information Types
11	Attachment 11 Part drawings	Component part drawings.
12	Attachment 12 Test results	Development test results, component and test specifications, test set-up, and photographs of testing.

Federal-Mogul requests confidential treatment of the information in these documents because it includes trade secrets, disclosure of which would cause substantial competitive

Federal-Mogul Corporation • World Headquarters
2655 Northwestern Highway • Southfield, Michigan 48034
Tel. (248) 354-2520 • Fax (248) 354-8103
Iwona_Villaire@fmc.com

ine Glassman, Esq.
21, 2005

Federal-Mogul submits that the competitive harm would be substantial because the design and manufacture of vehicle components is the core of its business, and because competition in that business is intense.

Documents in response to Request numbers 11 and 12, on the CD labeled Attachment 3, Response to Q11 and Q12, identified above, disclose Federal-Mogul's test procedures, methods of product development, and performance testing. The development of test procedures involves time, effort, and skill. Knowledge of how Federal-Mogul tests and develops a product would give a competitor valuable information that it would otherwise have to spend its time and money to develop, and therefore would deprive Federal-Mogul of its competitive advantage of its efforts without any compensation. These test procedures and results, warranty data and quality information would give competitors insight into Federal-Mogul methodologies and business practices for evaluating its products.

Documents in response to Request numbers 11 and 12, on the CD labeled Attachment 3, Response to Q11 and Q12, identified above, contain engineering part numbers and other design data. This information would give competitors insight into Federal-Mogul's methodologies and disclose confidential information about the costs, design and performance of its products, without spending their own time or compensating Federal-Mogul for the knowledge they would gain.

Federal-Mogul treats the above material as confidential proprietary information available only to authorized Federal-Mogul supplier and customer personnel who have a business relationship with them and are not otherwise available to the public. These documents are maintained under a record-keeping system that is intended to control dissemination of confidential information within Federal-Mogul, supplier and customer personnel, and to assure that it is not widely disseminated outside Federal-Mogul. Multiple security systems are used to control access to facilities and record storage systems where confidential information is maintained and employees receive training in information security policies and procedures.

To the best of our knowledge, NHTSA, other Federal Agencies, or the Federal Courts have made no prior determinations of the confidentiality for these documents. These documents, however, have normally been granted confidential treatment by NHTSA in the past, to the best of our knowledge.

Documents subject to this request for confidentiality are being provided and have already been stamped "CONFIDENTIAL". If a request for disclosure of any or all of this information is received by NHTSA, Federal-Mogul requests notification of receipt of such request and, if necessary, an opportunity to further explain the reasons why the material is trade secret and commercial information which should not be disclosed under applicable statutes and regulations.

Federal-Mogul Corporation • World Headquarters
26555 Northwestern Highway • Southfield, Michigan 48034
Tel. (248) 354-2520 • Fax (248) 354-8103
Ivonna_Villaire@fmo.com

Jacqueline Glassman, Esq.
March 21, 2005
Page 3

If you require further information about this request, please do not hesitate to call me at 248-354-2520.

Sincerely,



Iwona Niec Villaire
Senior Counsel

Enclosures

CERTIFICATE IN SUPPORT OF REQUEST FOR CONFIDENTIALITY

I, Gregory Grigsby, pursuant to the provisions of 49 CFR Part 512, state as follows:

- (1) I am a Vice President of Federal-Mogul Corporation and am authorized to execute this certificate on its behalf.
- (2) I certify that the information contained in the documents identified in the letter dated March 21, 2005 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 Federal-Mogul personnel who have responsibility for the documents 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 Federal-Mogul has claimed confidential treatment has never been released or made available outside Federal-Mogul 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 Federal-Mogul because of unauthorized or inadvertent disclosure.
- (7) I certify under penalty of perjury that the foregoing is true and correct. Executed on this the 21st day of March 2005.

 3/21/05

Gregory Grigsby
Vice President - Chassis and Brake Hard Part Operation

GM664A
EA04-035

ATTACHMENT "1"

**GM664A
EA04-035**

ATTACHMENT "2"

GM CONFIDENTIAL

**GM664A
EA04-035**

ATTACHMENT "3"

FEDERAL MOGUL CONFIDENTIAL