

Ford Motor Company

2005 MAR 18 12 53 22

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

March 16, 2005

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

Dear Ms. Glassman:

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

Two copies of information referenced in the Ford Motor Company (Ford) January 28, 2005 response as Appendix K to the agency's December 3, 2004 inquiry, NVS-214bby PE04-078 are attached. Also attached, for your convenience, is a copy of Ford's response to the ODI's requests.

This request amends an earlier request for confidential treatment that was submitted to the agency on February 3, 2005. Please disregard the February 3, 2005 request.

This letter provides support for Ford's claim of confidentiality in accordance with 49 CFR Part 512.8. Ford requests confidential treatment for those documents that contain privileged and confidential commercial information exempt from disclosure pursuant to 49 CFR § 512.15, 5 U.S.C. § 552(b)(4), and 49 U.S.C. § 30167.

Ford requests confidential treatment for the documents included in Appendix K because the documents are not customarily released to the public by Ford and because the documents contain confidential business information, the disclosure of which would likely cause substantial competitive harm to Ford (as contemplated in 49 CFR § 512.15, 5 U.S.C. § 552(b)(4), and 49 U.S.C. § 30167). In response to direction provided by your office concerning prior confidentiality submissions, the confidential documents in this submission are organized into categories as set forth in Attachment I.

Ford documents of the types listed 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 our knowledge.

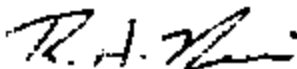


The documents in Appendix K contain commercial information and are exempt from disclosure pursuant to 49 CFR § 512.15, 5 U.S.C. § 552(b)(4), and 49 U.S.C. § 30167. If part of a page contains confidential information, the confidential portion has been bracketed by hand and marked with the letter "C", and the top margin has been stamped "CONFIDENTIAL." All of the aforementioned notations on the confidential documents were made as part of this response.

Ford requests that these documents be granted confidential treatment by the agency for a period of ten years. Earlier disclosure of these 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 notices to Paul L. Fabien, Ford Motor Company, Suite 1400, Parklane Towers West, Three Parklane Blvd., Dearborn, Michigan 48126. Mr. Fabien may also be contacted by telephone at (313) 621-1656, or by e-mail at pfabien2@ford.com. Thank you for your continuing courtesy.

Sincerely,



James P. Vondale

Attachments