



GENERAL MOTORS NORTH AMERICA
Structure & Safety Integration

August 26, 2005

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

OFFICE OF CHIEF
COUNSEL

GM-671

Re: Request for Reconsideration of Confidentiality Determination / PE04-080

Dear Ms. Glassman:

This is in response to Otto Matheke's July 22, 2004 letter, denying confidential treatment of Attachment 3 CD Supplier Confidential attachments containing information from Grede Foundries, Inc. (Grede) in response to PE04-080 regarding alleged steering knuckle fracture in Model Year 2003 and 2004 Hummer H2 SUV and H2 SUT vehicles.

The purpose of this letter is to request reconsideration for confidential treatment of the Grede attachments in "Attachment 3 CD Supplier Confidential" based on changed circumstances: Grede has now provided a letter explaining its basis for seeking confidential treatment and a certification in support of request for confidentiality.

If you require further information about this request, please do not hesitate to call me at 586-986-8029.

Sincerely,

Gay P. Kent
Director,
Product Investigations

Attachments

Product Investigations

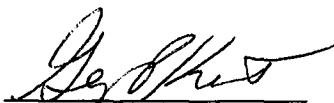
Mail Code: 480-111-E18 • 30200 Mound Road • Warren, MI 48090-9010
GM671 Confidentiality Reconsider Request



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 General Motors 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 August 26, 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 26th day of August 2005.



Gay P. Kent
Director,
Product Investigations