

OCT - 6 2005

Paul Fabien  
Ford Motor Company  
Suite 1400  
Parklane Towers West  
Three Parklane Blvd.  
Dearborn, MI 48126

Re: Request for Confidential Treatment of Information Provided in Response to  
PE05-033

Dear Mr. Fabien:

This responds to James P. Vondale's letter of August 19, 2005 requesting confidential treatment for information that Ford Motor Company (Ford) provided in the above agency inquiry. Ford seeks confidential treatment for the documents provided in Appendix H. Ford requests confidential treatment for a period of ten (10) years.

Ford asserts that the information described above contains documents not customarily released to the public by Ford and is confidential business information exempt from disclosure pursuant to 49 CFR § 512.15 and 5 U.S.C. § 552(b)(4). It claims that the disclosure of the documents in Appendix H would likely cause Ford to suffer substantial competitive harm.

According to Ford, the information in Appendix H consists entirely of Process Sheets, which are internal Ford documents outlining Ford's assembly and manufacturing procedures. Ford asserts that the disclosure of its Process Sheets would cause it to suffer substantial competitive harm because competitors could use the information to develop or improve their own products and processes without the need to invest the substantial resources invested by Ford.

I have decided to grant your request.

Because the information contained in Appendix H was submitted to the agency in response to the above information request, we reviewed your claim for confidential treatment under the test announced in *National Parks & Conservation Ass'n v. Morton*, 498 F.2d 765 (D.C. Cir. 1974) and its progeny. Under that test, information is confidential under Exemption 4 of the Freedom of Information Act if its disclosure is likely to cause substantial competitive harm to the submitter or to impair the government's ability to collect the information in the future.

As discussed above, the information in Appendix H is described as Ford's manufacturing processes. This information is not readily available to the public. Further, the agency believes that the disclosure of this detailed information would be likely to cause Ford to suffer substantial competitive harm. Accordingly, I am granting confidential treatment to the contents that you have identified as confidential in Appendix H.

Subject to the conditions below, this grant of confidential treatment will remain in effect for the period of time requested (ten years).

This grant of confidential treatment is subject to certain conditions. The information may be disclosed under 49 CFR § 512.22 based upon newly discovered or changed facts, and you must inform the agency of any changed circumstances that may affect the protection of the information (49 CFR § 512.10). If necessary, you will be notified prior to the release of any information under the procedures established by our regulations (49 CFR § 512.22(b)).

Sincerely,

/s/

Otto G. Matheke, III  
Senior Attorney

