

Ford Motor Company

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

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May 25, 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: Request Under 49 CFR Part 512 for Confidential Treatment of Information

Enclosed are two copies of the material that Ford Motor Company (Ford) presented to the agency's Office of Defects Investigation on May 18, 2005 regarding EA05-003 related to 2003 and 2004 model year F-Superduty and Excursion vehicles equipped with 6.0L diesel engines. In order to address a question raised by the agency during the presentation, a supplemental slide regarding the mileage accumulation model used in our analysis has been added to the presentation material.

This letter provides support for Ford's claim of confidentiality in accordance with 49 CFR Part 512.8. Ford requests confidential treatment for this material because it has not been released to the public by Ford and because the material contains 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)). The material contains detailed warranty, reliability, and root causes analyses, as well as test procedures and results. Information concerning Ford's analysis of warranty, reliability, and root cause could be used by competitors to identify quality issues and modify competitive components and strategies to the detriment of Ford. Such information could be used by competitors to improve their own products and processes without the need to invest the substantial resources invested by Ford to develop the information.

Those pages that contain confidential information have been marked "ENTIRE PAGE CONFIDENTIAL" along the top margin as part of this submission.

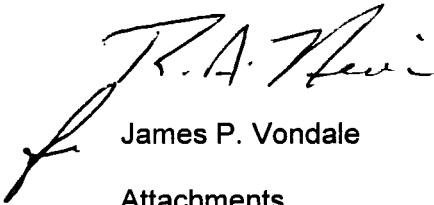
Ford information of this type is maintained under a record keeping system which is intended to control dissemination of this material within Ford, and to assure that the material is not disseminated outside of Ford, except as described in the attached certification, which is made pursuant to 49 CFR Part 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.



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

In the event 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 Fabien, Ford Motor Company, Suite 1400, Parklane Towers West, Three Parklane Blvd., Dearborn, MI 48126, telephone (313) 621-1656. Thank you for your continuing courtesy.

Sincerely,

A handwritten signature in black ink, appearing to read "J. P. Vondale". The signature is written in a cursive style with a large, sweeping initial "J".

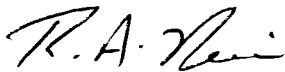
James P. Vondale

Attachments

**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 documents of this nature on behalf of Ford;
2. The information contained in the attachment to Ford's letter to NHTSA's Office of the Chief Counsel dated May 25, 2005 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 outside Ford;
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 outside Ford 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 outside Ford 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 this the 25th day of May, 2005.



R. A. Nevi