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July 26, 2006

NHTSA
WASHINGTON, DC 20580
JUL 27 2 16 06

Anthony M. Cooke
Chief Counsel
National Highway Traffic Safety Administration
Room 5219
400 Seventh Street, S.W.
Washington D.C. 20590

Re: EA 05-005 -- Request of Sensata Technologies, Inc. for Confidentiality

Dear Mr. Cooke:

This letter provides the supporting information required by NHTSA's regulations at 49 C.F.R. § 512.8 in support of a claim for confidentiality under 49 C.F.R. Part 512 by Sensata Technologies, Inc. with respect to the entirety of certain documents that Sensata has chosen to voluntarily prepare for and submit to NHTSA. The documents relate to a sensor switch that Sensata, and its predecessor, Texas Instruments, Inc. supplied to Ford, and still produces. That sensor switch is under review by NHTSA in the above-referenced investigation. A Certificate in Support of Request for Confidentiality in the form required by 49 C.F.R. Part 512 Appendix A has been prepared by a responsible Sensata official and is being submitted to the agency with this letter and a copy of the documents at issue.

The documents reflect the results of various reviews of the switch undertaken by Sensata engineers at the request of Mr. Bruce York of ODI. But for that request, Sensata would not have undertaken these analyses. Nor would Sensata make the results of its analyses a matter of public record in the ordinary course of its business.

Sensata therefore submits that the documents constitute a "trade secret" in that they reflect information that was "voluntarily submitted and is the kind of information that is customarily not released to the public by the person from whom it was obtained." *See* 49 CFR 512.3(c)(2)(ii). Further, the analyses undertaken by Sensata reflect information about the switch at issue that competitors might find valuable, and thus the release of this information could have adverse competitive implications for Sensata. *See* 49 CFR 512.3(c)(2)(i). In addition, failure to retain the confidentiality of information generated as a result of analyses undertaken voluntarily at NHTSA's request could "impair the Government's ability to obtain necessary information in the future." *See* 49 CFR 512.3(c)(2)(i).

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Specifically, parties in the future may be unwilling to volunteer to undertake analyses for NHTSA unless they are assured that the analyses will be accorded confidential treatment.

As noted, Sensata has never publicly disclosed the information reflected in the documents at issue, and has taken reasonable steps to retain it as confidential. Sensata requests that NHTSA treat these documents as confidential indefinitely.

Please feel free to contact with me any questions or concerns regarding this letter.

Sincerely,



David H. Coburn
Attorney for Sensata Technologies, Inc.

cc: Steven Major, Sensata Technologies, Inc.

Enc.

Certificate in Support of Request for Confidentiality

I, Steven Major, pursuant to the provisions of 49 CFR part 512, state as follows:

(1) I am Steven Major, Vice President-Sensors, for Sensata Technologies, Inc. ("Sensata") and I am authorized by Sensata to execute this certificate on its behalf.

(2) I certify that the information contained in the documents with this certification ("documents") reflect the results of various analyses voluntarily undertaken by Sensata engineers, at the request of NHTSA, with respect to a certain sensor switch manufactured by Sensata for use in Ford vehicles. The information in these documents constitutes confidential and proprietary trade secret data that it is entitled to confidential treatment under 5 U.S.C. 552(b)(4) (as incorporated by reference in and modified by the statute under which the information is being submitted) and under NHTSA's confidentiality rules.

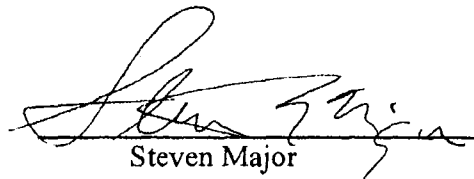
(3) I hereby request that the information contained in the documents be protected for an indefinite period of time. Sensata still manufactures the sensor switch to which the documents relate.

(4) This certification is based on the information provided by the responsible Sensata personnel who have authority in the normal course of business to release the information for which a claim of confidentiality has been made and to ascertain whether such information has ever been released outside Sensata.

(5) Based upon that information, to the best of my knowledge, information and belief, the information for which Sensata has claimed confidential treatment has never been released or become available outside Sensata.

(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 Sensata due to unauthorized or inadvertent disclosure.

(7) I certify under penalty of perjury that the foregoing is true and correct. Executed on this 24th day of July, 2006.


Steven Major