

Ford Motor Company

Automotive Safety Office
Environmental and Safety Engineering

August 1, 2006

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

Dear Mr. Cooke:

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

The attached document is being voluntarily submitted to the agency following a July 12, 2006 discussion concerning inquiry EA05-005 with Mr. Richard Boyd and Bruce York of the agency.

This letter provides support for claims of confidentiality by Ford in accordance with 49 CFR Part 512.8. Ford requests confidential treatment for the attached document because this type of information is not customarily released to the public by Ford, and because the document contains confidential business information, the disclosure of which would likely cause substantial competitive harm to Ford (as contemplated in 49 CFR § 512.15, and 5 U.S.C. § 552(b)(4)). Ford further bases its request for confidential treatment on the grounds that the document is being provided to NHTSA voluntarily.

Ford documents of this type 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 Ford's knowledge.

The document contains commercial information and is exempt from disclosure pursuant to 49 CFR § 512.15, 5 U.S.C. § 552(b)(4). The pages of the document for which Ford requests confidential treatment are labeled "ENTIRE PAGE CONFIDENTIAL."

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



Mr. Anthony Cooke

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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 written notices to me at Ford Motor Company, Suite 500, Fairlane Plaza South, 330 Town Center Drive, Dearborn, Michigan 48126. Please direct all non-written communication to Mr. Paul Fabien, who may be contacted by telephone at (313) 621-1656. Thank you for your continuing courtesy.

Sincerely,



R. A. Nevi

Attachments

**CERTIFICATE IN SUPPORT OF REQUEST
FOR CONFIDENTIALITY**

I, P. D. Souchock, pursuant to the provisions of 49 CFR Part 512, state as follows:

1. I am Manager, 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 Request Under 49 CFR Part 512 for Confidential Treatment of Information dated August 1, 2006, is confidential and proprietary data and is being voluntarily 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 personally inquired of the responsible Ford Motor Company personnel who have authority in the normal course of business to release the information for which a claim of confidentiality has been made to ascertain whether such information has ever been released outside Ford Motor Company;
4. Based upon such inquiries, to the best of my knowledge, information and belief, the information for which Ford Motor Company has claimed confidential treatment has never been released or become available outside Ford Motor Company except as hereinafter specified:
 - Portions of this document 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 representation beyond those contained in this certificate and in particular, I make no representations as to whether this information may become available outside Ford Motor Company because of unauthorized or inadvertent disclosure; and
6. I certify under penalty of perjury that the foregoing is true and correct. Executed on this 1st day of August 2006.

P. D. Souchock

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