

The Goodyear Tire & Rubber Company
Akron, Ohio 44316 - 0001

November 1, 2006
(previously submitted on May 30, 2006)

Office of Chief Counsel (NCC-113)
National Highway Traffic Safety Administration
400 Seventh Street, S.W., Room 5219
Washington, D.C. 20590

**Re: Request for Confidential Treatment of Information Included in Goodyear's
Response to a Request for Peer Information Related to EA05011**

Pursuant to 49 C.F.R. Part 512, The Goodyear Tire & Rubber Company (hereinafter, "Goodyear") seeks confidential treatment of the information submitted in response to a request for peer information related to EA05011. Attached is the "Certificate in Support of Request for Confidentiality," required under Appendix A to 49 C.F.R. Part 512, as well as a Verification Affidavit. Other specific information required by 49 C.F.R. Part 512 is provided below.

Information Supporting Goodyear's Request for Confidentiality

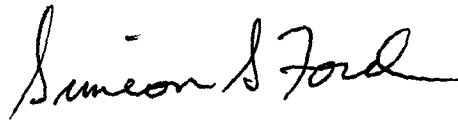
The data contained on those pages marked "CONFIDENTIAL" is considered business information the disclosure of which would be detrimental to the business interests of Goodyear. Specifically, the information contained in the responses to questions 1) and 2) includes original equipment as well as replacement tire sales figures for the subject peer tires that are not readily available to our competitors. It also contains warranty adjustment information for these same tires. The release of this data to the news media and /or the public would likely cause substantial competitive harm to Goodyear. See *National Parks and Conservation Association v. Morton*, 498F.2d 765 (D.C. Cir. 1974).

The information submitted in response to questions 3), 4), 5), 6), and 7) relates to the manner and methods employed by Goodyear in designing its tires and includes information not available to Goodyear's competitors. This data is extremely proprietary and its release would give Goodyear's competitors access to information not otherwise available.

For these reasons, there is attached an affidavit in support of Goodyear's request for confidentiality with respect to the information supplied in response to this request.

Thank you in advance for your consideration of this request for confidential treatment of the response. Additionally, the Affidavit that verifies the responses is also attached. Please direct all correspondence concerning Goodyear's request for confidentiality directly to me.

Sincerely,

A handwritten signature in black ink that reads "Simeon S. Ford". The signature is written in a cursive style with a large, stylized 'S' and 'F'.

Simeon S. Ford
Manager, Government and Customer Compliance
The Goodyear Tire & Rubber Company

Attachment A – Compact Disk marked “Confidential Business Information”
Attachment B – Compact Disk marked “RV Tire Brochure”