



NHTSA  
 2006 DEC 20 10:10  
 CHIEF  
 COUNSEL

December 18, 2006

Anthony Cooke, Esq.  
 Office of Chief Counsel  
 NHTSA Safety Assurance  
 Room #5219  
 400 Seventh Street, S.W.  
 Washington, D.C. 20590

NVS-214pk  
 EA05-017

Dear Mr. Cooke:

As a follow-up to a general discussion of H2 Steering Knuckle with the Office of Defects Investigation (ODI) on December 15, 2006, General Motors (GM) is submitting the attached documents to ODI voluntarily.

Document File Name	Information types
Chronology Conclusion	GM Engineering risk assessment methodology
Barksdale Case GM Confidential	GM Engineering a field incident assessment methodology
Final Summary of Incidents_121406	GM Engineering field incident risk assessment methodology
Metallurgy with the SAE 45-12 slides	GM Engineering metallurgy risk assessment methodology
Knuckle Design Review (rev 12-11-06)	GM Engineering knuckle design comparison
Front Suspension Ball Joints July 8 1982	GM Engineering knuckle and ball joint design guideline
Tapered Ball Stud Meeting Synopsis March 30 1988	GM Engineering knuckle and ball joint design guideline
Final Rate Discussion	GM Engineering rate comparison information
Rate Table Complaint Only	GM Engineering rate comparison tables and data
Rate Table VOQ Warranty Complaint	GM Engineering knuckle and ball joint design guideline

The documents are provided on Attachment 1 Disc GM Confidential and are stamped "GM Confidential." GM requests that this information be afforded confidential treatment without a time limitation by the NHTSA. GM is providing this information voluntarily and believes it should be treated as confidential information under 49 CFR Part 512.15(d), 5 U.S.C. Section 552(b)(4) and 49 U.S.C. Section 30167(a).

GM believes that the standard set forth in 49 CFR Part 512.15(d) is applicable to this request. Under that standard, information should be accorded confidential treatment if it "is provided to NHTSA voluntarily and is not customarily released to the public" by the manufacturer. Both of these criteria are met here, since GM is submitting this information voluntarily and the information in question, which consists of GM's testing, evaluation and assessment methodology for vehicle

**Product Investigations**

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 GM671B Voluntary Confidentiality Request NHTSA Visit 15DEC06



performance issues, is not customarily released to the public by GM. *Critical Mass Energy Project v. NRC*, 975 F.2d 871 (D.C. Cir.1992).

GM requests confidential treatment of the information contained in these documents because its disclosure would cause substantial competitive harm. GM submits that the competitive harm would be substantial, because the design and manufacture of vehicles and vehicle components are the core of its business and because global competition in that business is intense.

GM treats the above material as confidential proprietary information available only to authorized GM and supplier personnel and not otherwise available to the public. The documents are maintained under record-keeping systems which are intended to control dissemination of this material within GM, and to assure that it is not disseminated outside the Corporation, except as described in the attached certification made pursuant to 49 CFR Part 512.4(b).

The corresponding electronic copy of this document is being provided on a Disc labeled, "Attachment 1 Disc GM Confidential". If a request for disclosure of any or all of this information is received by the NHTSA, GM requests notification of receipt of each such request and, if necessary, an opportunity to further explain the reasons why such material is confidential information which should not be disclosed under the applicable statutes and regulations.

Please contact me if you require further information about this request.

Sincerely,



Gay P. Kent  
Director  
Product Investigations

Enclosure

**CERTIFICATE IN SUPPORT OF REQUEST FOR  
CONFIDENTIALITY**

I, Gay Kent, pursuant to the provisions of 49 CFR Part 512, state as follows:

- (1) I am Director of Product Investigations of General Motors Corporation and am authorized to execute this certificate on its behalf.
- (2) I certify that the information contained in the documents identified in the letter dated December 18, 2006 is confidential and proprietary data and is being submitted with the claim that it is entitled to confidential treatment under 5 U.S.C. 552(b)(4) and 49 C.F.R. Part 512.
- (3) I hereby request that the information be protected without a time limitation.
- (4) This certification is based on the information provided by the responsible GM personnel who have responsibility for the documents being provided to NHTSA for which a claim of confidentiality has been made.
- (5) Based on that information, to the best of my knowledge, information and belief, the information for which GM has claimed confidential treatment has never been released or made available outside GM and supplier or customer personnel.
- (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 GM because of unauthorized or inadvertent disclosure.
- (7) I certify under penalty of perjury that the foregoing is true and correct. Executed on this the 18<sup>th</sup> day of December 2006.

  
\_\_\_\_\_  
Gay P. Kent  
Director  
Product Investigations

**GM671B  
EA05-017  
ODI Meeting 12/15/2006**

**ATTACHMENT "1"**  
**GM CONFIDENTIAL MATERIAL**

From: Origin ID: (586)986-1076  
Brian Frantz  
General Motors  
30200 Mound Rd.

Warren, MI 48090



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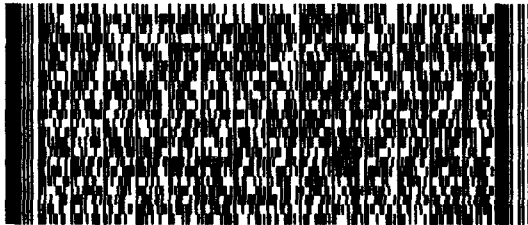
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**Anthony Cooke, Esq.**  
**NHTSA Office of Chief Counsel**  
**400 Seventh St. S.W.**  
**Room 5219**  
**Washington, DC 20590**



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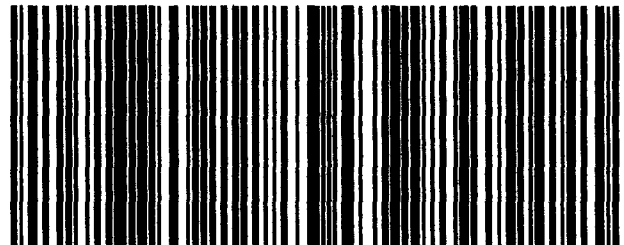
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