



Volvo Cars of North America, LLC

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OFFICE OF CHIEF
COUNSEL

May 31, 2006

Mr. Jeffrey Quandt, Chief
Vehicle Control Division
Office of Defects Investigation
National Highway Traffic Safety Administration
400 Seventh Street, S.W., Room 5326
Washington, D.C. 20590
202-366-4883

NVS-213
EA05-021

Mr. Otto Matheke, Attorney
Office of Chief Counsel
National Highway Traffic Safety Administration
400 Seventh Street, S.W., NCC-110, Room 5219
Washington, D.C. 20590
202-366-4883

Subject:
Confidentiality Request for Documents in Support of May 10-11, 2006 Meeting -
ETM Engineering Analysis [Reference NVS-213/EA05-021]

Dear Mr. Quandt and Mr. Matheke:

This letter is hereby submitted to NHTSA in support of NVS-213/EA05-021, Electronic Throttle Module. The enclosures are documents from Volvo Cars of North America, LLC (VCNA) in support of the May 10-11, 2006 Meeting with NHTSA.

These three documents enclosed constitute confidential business information within the meaning of 5 U.S.C. § 552(b)(4) and protected from disclosure pursuant to 18 U.S.C. § 1905. 'Confidential business information' includes commercial information that has not been publicly disclosed and, if required to be submitted, "its release is likely to cause substantial harm to the competitive position of the person from whom the information was obtained." See 49 CFR § 512.3(c)(2)(i).

The documents enclosed have never been released to the public and there is no intention to ever release this information to the public. We have verified that to date only those associated with

this information and information preparation have had access to this information. Future release of such information, if any, would only be done subject to confidentiality agreements. Volvo firmly believes that the release of the documents included in this submission is likely to cause substantial competitive harm to Volvo Car Corporation and to Volvo Cars North America, LLC (Volvo) for the following reason:

These documents contain technical trade secrets, as defined by 49 CFR § 512.3(c)(1). These documents include specific information for components and processes that are unique and proprietary to Volvo. If this information were to become public, Volvo proprietary technology would become available to Volvo's competitors and to others, causing Volvo to suffer significant damage. Such information could be extremely valuable in assisting competitors who manufacture vehicle computer systems. Volvo has dedicated the equivalent of several years of labor, expense, and expertise into the development of this technology. This information could provide a competitor with a "jump-start" in an area in which it might be years behind Volvo in research, development, and product planning.

Accordingly, Volvo requests that the documents provided within this submission, in support of the May 10-11, 2006 meeting with NHTSA, be treated within the meaning of confidential business information pursuant to 5 U.S.C. § 552(b)(4) and Section 112(e) of the National Traffic and Motor Vehicle Safety Act of 1966 as amended and implemented in 49 C.F.R. Part 512. Pursuant to 49 CFR § 512.4, a certificate in support of Volvo's Request for Confidentiality is enclosed with this submission.

In accordance with 49 C.F.R. § 512.6(b), each page of this submission has been labeled "Confidential." If you have any questions, please contact me at (201) 767-4772, or Diana Lidgett of my staff at (201) 768-7300 (ext. 7249).

Sincerely,

VOLVO CARS OF NORTH AMERICA, LLC
Customer Service



William Shapiro, P.E.
Manager, Regulations & Compliance

Enclosures:

"ETS presentation for NHTSA per May 10 and 11 Meeting"

"Schema_Logic" (the internal wiring in the ETM)

"Schema_power" (a "close up" of the H-bridge; Power supply inside the ETM)

Certificate in Support of Request for Confidentiality

CERTIFICATE IN SUPPORT OF REQUEST FOR CONFIDENTIALITY

I, William Shapiro, pursuant to the provisions of 49 C.F.R. Part 512, state as follows:

(1) I am Manager, Regulatory and Compliance and I am authorized by Volvo Cars of North America, LLC (VCNA) to execute this certificate on its behalf;

(2) I certify that the information contained in the documents enclosed in this submission:

- "ETS presentation for NHTSA per May 10 and 11 Meeting"
- "Schema_Logic" (the internal wiring in the ETM)
- "Schema_power" (a "close up" of the H-bridge; Power supply inside the ETM)

provided in support of the May 10-11 meeting with NHTSA, is confidential and proprietary information, and is being submitted with the claim that it is entitled to confidential treatment pursuant to 5 U.S.C. § 552(b)(4) and Section 112(e) of the National Traffic and Motor Vehicle Safety Act of 1966, as amended and implemented in 49 C.F.R. Part 512;

(3) I hereby request that the information referenced in (2) above be protected indefinitely;

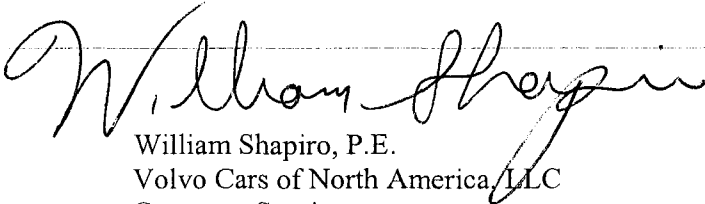
(4) I, or members of my staff, have personally inquired of the responsible personnel of VCNA and Volvo Car Corporation (Volvo) who have the authority, in the normal course of business to release the information for which a claim of confidentiality has been made, to ascertain whether such information has ever been released outside Volvo, including Volvo suppliers Magnetti Marelli, Bosch and Denso; and Volvo's parent company, Ford Motor Company.

(5) Based upon such inquiries and to the best of my knowledge, information and belief, the information for which Volvo has claimed confidential treatment has never been released or become available outside Volvo or Ford Motor Company, except as needed by Volvo under appropriate confidentiality agreements;

(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 Volvo because of unauthorized or inadvertent disclosure (except as stated in paragraph 5); and

(7) I certify under penalty of perjury that the foregoing is true and correct to the best of my information and belief.

Executed on this day, the 31st of May 2006.



William Shapiro, P.E.
Volvo Cars of North America, LLC
Customer Service
Manager, Regulatory and Compliance